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California Coastal National Monument Proposed Resource Management Plan/ Final Environmental Impact Statement

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CALIFORNIA COASTAL NATIONAL MONUMENT

Proposed Resource Management Plan/ Final Environmental Impact Statement

California State Office
Bureau of Land Management
United States Department of the Interior

Approved:

Mike Pool
State Director

May 2005

BLM/CA/ES-2005-0081790-1600

DOI Control Number: FES 05-13

Reader's Guide

Dear Reader:

Enclosed for your review is the Proposed Resource Management Plan (RMP) and Final Environmental Impact Statement (EIS) for the California Coastal National Monument (CCNM). The monument was established by Presidential Proclamation on January 11, 2000. The proclamation directed the Secretary of the Interior to manage the monument through the U.S. Bureau of Land Management (BLM); BLM, therefore, initiated development of a management plan for the conservation and protection of the lands contained within the monument. The best management practices of consultation, communication, and cooperation have been used throughout the planning process.

This document is a revision to the Draft RMP/Draft EIS submitted for public comment in August 2004; it has been revised to reflect the input of government agencies, private organizations, and individuals. It contains the goals, objectives, policies, and plan actions that will guide BLM in management of the CCNM. In addition to printed copies, this Proposed RMP/Final EIS may be accessed via internet at the web address listed below.

Release of the Proposed RMP initiates a 30-day period during which any person who participated in the planning process and has an interest that may be adversely affected by approval of the proposed plan may submit a protest. Decisions that are protestable are the goals, objectives, management actions, and allowable uses found in Chapter 2 and outlined in Table 2-3. The protest must be filed within 30 days of the date that the U.S. Environmental Protection Agency (EPA) publishes the notice of availability for the CCNM Proposed RMP/Final EIS in the *Federal Register*. Instructions for filing a protest with the Director of the BLM regarding the Proposed Plan/Final EIS may be found at 43 CFR 1610.5 and are outlined below. A protest may raise only those issues that were submitted for the record during the planning process. E-mail and faxed protests will not be accepted as valid protests unless the protesting party also provides the original letter by either regular or overnight mail postmarked by the close of the protest period. Under these conditions, BLM will consider the e-mail or faxed protest as an advance copy, and it will receive full consideration.

If you wish to provide BLM with such advance notification, please direct faxed protests to the attention of the BLM protest coordinator at (202) 452-5112 and e-mails to Brenda_Hudgens-Williams@blm.gov.

Please direct the follow-up letter to the appropriate address provided below.

The protest must contain:

a. The name, mailing address, telephone number, and interest of the person filing the protest;
b. A statement of the issue or issues being protested;
c. A statement of the part or parts of the plan being protested;
d. A copy of all documents addressing the issue(s) that the protesting party submitted during the planning process or a statement of the date they were discussed for the record; and
e. A concise statement explaining why the protestor believes the State Director's decision is wrong.

All protests must be in writing and mailed to the following address:

Regular Mail:
U.S. Bureau of Land Management
Director (210)
Attention: Brenda Williams
P.O. Box 66538
Washington, D.C. 20035

Overnight Mail:
U.S. Bureau of Land Management
Director (210)
Attention: Brenda Williams
1620 L Street, N.W., Suite 1075
Washington, D.C. 20036

The Director will promptly render a decision on the protest. The decision will be in writing and will be sent to the protesting party by certified mail, return receipt requested. The decision of the Director shall be the final decision of the Department of the Interior.

All official documents, including this Proposed RMP/Final EIS and eventually the Approved RMP and Record of Decision, can be viewed at http://www.ca.blm.gov/pa/coastal_monument. Your interest in planning for the public lands within the CCNM is appreciated.

Herrick (Rick) E. Hanks
California Coastal National Monument Manager

User's Guide

The California Coastal National Monument (CCNM) Proposed Resource Management Plan (RMP) and Final Environmental Impact Statement (EIS) includes an executive summary, eight chapters, maps, and appendices.

The **Executive Summary** is a synopsis of the Proposed RMP/Final EIS. The Proposed RMP is described; and the effects of this plan on the resources, processes, and users are summarized here.

Chapter 1 (Introduction) contains introductory material for the Proposed RMP/Final EIS. It describes the purpose and need for the plan; defines the planning area; reviews the issues identified and addressed through the scoping and planning processes; outlines the planning criteria and the planning process; describes the overall mission, vision, and management approach for the monument; and identifies the plan goals and objectives.

Chapter 2 (Proposed Resource Management Plan) describes the management strategies selected for implementation following public review of the Draft RMP. It includes a description of the actions proposed to be undertaken within the various resource and management elements of the plan.

Chapter 3 (Comments and Responses) includes all comments received on the Draft RMP/Draft EIS and responses to those comments. Because many comments addressed similar concerns, master responses have been prepared to address issues related to jurisdiction, sensitive site characterization, and recreation access. Questions or comments related to other issues are addressed individually.

Chapter 4 (Revisions to the EIS) contains errata and changes to the text in the EIS in response to public comment.

Chapter 5 (Consultation and Coordination) includes a summary of public involvement and agency coordination undertaken during the course of the CCNM planning process to date.

Chapter 6 (List of Preparers) identifies the individuals involved in preparing the Proposed RMP/Final EIS.

Chapter 7 (References) lists the printed material and individuals cited in this document.

Chapter 8 (Glossary) aids the reader in understanding the information in this document.

The **Map Atlas** and **Appendices** augment the information in this document with additional technical information and illustrations.

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List of Acronyms and Abbreviations

ACEC	Areas of Critical Environmental Concern
ACHP	Advisory Council on Historic Preservation
AFB	Air Force Base
ARPA	Archaeological Resources Protection Act
BLM	U.S. Bureau of Land Management
BMPs	best management practices
Caltrans	California Department of Transportation
CCNM	California Coastal National Monument
CCR	California Code of Regulations
CESA	California Endangered Species Act
CEQA	California Environmental Quality Act
CFGC	California Fish and Game Commission
CFR	Code of Federal Regulations
CHRIS	California Historical Resources Information System
CNHP	California Natural Heritage Program
CRMP	Cultural Resources Management Plan
CSU	California State University
DFG	California Department of Fish and Game
DoD	U.S. Department of Defense
DOI	U.S. Department of the Interior
DPR	California Department of Parks and Recreation
EIS	environmental impact statement
EPA	U.S. Environmental Protection Agency
ESA	Federal Endangered Species Act of 1973
FAA	Federal Aviation Administration
FLPMA	Federal Land Policy and Management Act of 1976
FO	Field Office
FWS	U.S. Fish and Wildlife Service
GFNMS	Gulf of the Farallones National Marine Sanctuary
GIS	geographic information system
ID Team	Interdisciplinary Team
MBNMS	Monterey Bay National Marine Sanctuary
MBTA	Migratory Bird Treaty Act
MMPA	Marine Mammal Protection Act
MMR	master meeting response
MMS	U.S. Minerals Management Service
MOU	memorandum of understanding
MPA	marine protection area
MR	master response
NAHC	Native American Heritage Commission
NEPA	National Environmental Policy Act of 1969
NHPA	National Historic Preservation Act of 1966
NMFS	National Marine Fisheries Service
NOAA	National Oceanic and Atmospheric Administration
NOI	Notice of Intent
NPS	National Park Service

List of Acronyms and Abbreviations (continued)

NRHP	National Register of Historic Places
NRDA	Natural Resource Damage Assessment
OEPC	Office of Environmental Planning and Coordination
OSPR	Oil Spill Prevention and Response
PISCO	Partnership for Interdisciplinary Studies of Coastal Oceans
PRBO	Point Reyes Bird Observatory
PRC	Public Resources Code
RFA	Recreational Fishing Alliance
RMP	Resource Management Plan
Scoping Report	Scoping Report for the California Coastal National Monument Resource Management Plan
SCSB	Sonoma Coast State Beach
SHPO	State Historic Preservation Officer
SIMoN	Sanctuary Integrated Monitoring Program
SLC	California State Lands Commission
SR	State Route
TCPs	traditional cultural properties
UC	University of California
USCG	U.S. Coast Guard
USFS	U.S. Forest Service
USGS	U.S. Geological Survey
VRM	Visual Resource Management

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United States Department of the Interior

BUREAU OF LAND MANAGEMENT
California Coastal National Monument
299 Foam Street
Monterey, California 93940
Telephone: (831) 372-6115

In Reply Refer To:
1610.4-8(P)
CA-939

May 27, 2005

Dear CCNM Reviewer:

I am pleased to present you with a copy of the **Proposed Resource Management Plan** (RMP)/**Final Environmental Impact Statement** (EIS) **for the California Coastal National Monument** (CCNM) for your review. This document moves us a major step closer to establishing the formal framework for the long-term management and protection of the CCNM. With this document, BLM has completed the environmental impact statement and is identifying the proposed management strategies for managing and protecting the public lands contained within the CCNM. This Proposed RMP reflects the input and comments from governmental agencies, private organizations, and numerous individuals on the Draft RMP/Draft EIS issued August 2004.

The key feature of the Proposed RMP is that it provides the following: (1) the management goals for the CCNM and (2) a description of the objectives, management actions, and allowable uses within each program area applicable to the monument. In addition, release of the Proposed RMP initiates a 30-day period during which any person who participated in the planning process and has an interest that may be adversely affected by approval of the proposed plan may submit a protest to the Director of the BLM. Decisions that can be protested are the goals, objectives, management actions, and allowable uses found in Chapter 2 and outlined in Table 2-3. The Reader's Guide outlines the process for filling a protest. With the U.S. Environmental Protection Agency's publication of the notice of availability for the CCNM Proposed RMP/Final EIS in the *Federal Register* on June 10, 2005, the 30-day period within which to protest the CCNM Proposed RMP was initiated. Therefore, **all protests must be received by the BLM in the Washington (D.C.) Office on or before July 10, 2005.**

Overall, the Proposed RMP focuses on protection of the geologic formations of the CCNM and the habitat they provide for seabirds, marine mammals, and unique vegetation, as well as the monument's scenic and cultural values. The Proposed RMP also discusses provisions for research, education, and additional planning through collaboration, cooperation, and coordination with agencies and organizations that have natural and/or cultural resources management responsibilities along the coast. The goals of the Proposed RMP reflect the direction contained in the Presidential Proclamation that created the CCNM and the issues identified by people interested in the management and protection of coastal resources.

Thank you for your interest in the planning effort for the California Coastal National Monument. The BLM is looking forward to continuing to work with you on the development of this unique national monument and the protection and conservation of California's unique coastal resources.

Sincerely,

Herrick E. Hanks

Herrick (Rick) E. Hanks
California Coastal National Monument Manager

Executive Summary

California Coastal National Monument Proposed Resource Management Plan/ Final Environmental Impact Statement

Brad Damitz (BLM//NOAA)

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Executive Summary – Proposed Resource Management Plan

ES.1 Introduction

The U.S. Department of the Interior's Bureau of Land Management (BLM) has prepared this Proposed Resource Management Plan (RMP) to provide direction for managing the public lands contained within the California Coastal National Monument (CCNM). The RMP is the result of a 2-year process of planning, inter-agency coordination, and public involvement and reflects public and agency comment on a Draft RMP issued by BLM in August 2004. This summary provides:

- The background that has led BLM to prepare the RMP for this national monument,
- A description of the issues that are addressed in the RMP,
- A description of the proposed management strategies, and
- The public involvement that has carried BLM to this place in the planning process.

The CCNM consists of more than 20,000 offshore rocks and small islands (the portion above mean high tide) that are spread along the 1,100-mile California coastline.

The CCNM RMP is not a traditional BLM RMP because of the unique physical conditions of the land within the monument and the specific direction for management contained in the Presidential Proclamation that established the monument. Since 1930, the rocks and small islands along California's coast that now make up the CCNM have been provided some protection from most land and mineral uses by a series of withdrawals. The land does not support grazing, timber harvesting, or off-highway vehicle activity, and none of the land is being considered for disposal. The Presidential Proclamation emphasizes that the principal function of BLM management for this area is to protect the natural and cultural resources of the rocks and islands. Given these circumstances and the lack of a previous comprehensive plan for managing the rocks and islands, this RMP is establishing a framework for implementing the protections identified in the Presidential Proclamation. More specific management direction will be developed as more is learned about the monument's resources through inventory and BLM undertakes an adaptive management approach on the CCNM.

ES.2 Background

CALIFORNIA COASTAL NATIONAL MONUMENT
Islands, rocks, pinnacles and reefs
Eureka
San Francisco
Los Angeles
San Diego
Pacific Ocean

The CCNM is a part of the recently established National Landscape Conservation System and is among the Nation's most unique national monuments. It is also one of the most frequently viewed landscapes in the nation, as millions of Californians and visitors from other states and countries visit the California coast to enjoy the scenic beauty, the wildlife, and the crashing waves that accompany its rocks and islands. The CCNM was established on January 11, 2000, by Presidential Proclamation under the authority of the Antiquities Act of 1906. The monument consists of more than 20,000 rocks and small islands that are spread along the 1,100-mile California coastline. The monument does not include any of California's mainland but consists of about 1,000 acres of rocks and small islands that stand above mean high tide, within a vast 14,600-square-nautical-mile segment of the Pacific Ocean's continental shelf. Its unique location and physical conditions have created an irreplaceable array of fragile ecosystems and their component biological, physical, and socio-cultural dimensions.

The rocks and islands of the CCNM are public lands[1] owned by the United States and administered by the Secretary of the Interior through the BLM. These lands are, or have been at one time, public domain lands[2] as a result of California being ceded to the United States in 1848 and have been under the administration of BLM and its predecessor agency, the U.S. General Land Office. Minimal management activity has been necessary over the past 150 years, and no comprehensive management plan has been developed for the rocks and islands. Development of a memorandum of understanding (MOU) in 1983 between BLM and the California Department of Fish and Game (DFG) provided DFG authority to manage the rocks and islands for the benefit of its wildlife resources, while BLM retained the legal responsibility for the Sanctuary. With the establishment of the CCNM in 2000, BLM extended its partnership with DFG and added the California Department of Parks and Recreation (DPR) through the initiation of an interim MOU regarding the cooperative management of the rocks and islands of the CCNM.

In 1988, the California Fish and Game Commission designated the rocks and islands within one-half mile of the coast as the California Offshore Rocks and Pinnacles Ecological Reserve. This designation was made under the California Code of Regulations (CCR), Title 14. State regulations for this designation are contained in Section 630 of Title 14.

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[1] "Public lands" are any land and interest in land owned by the United States that are administered by the Secretary of the Interior through the BLM, without regard to how the United States acquired ownership. The two categories of public lands include (1) public domain lands, and (2) acquired lands (i.e., lands in federal ownership that were obtained by the U.S. Government through purchase, condemnation, gift, donation, or exchange).

[2] "Public domain lands" are the original public domain lands that have never left federal ownership. The term "original public domain lands" embraces all the area to which title was vested in the U.S. Government by virtue of its sovereignty. All of what is now California (including all of the coastal rocks and islands), except for the Spanish and Mexican land grants and private land claims recognized by the U.S. Government, were once original public domain lands as a result of the United States acquiring the land through cession from Mexico in 1848, following war with Mexico. At least one CCNM islet has gone out of Federal ownership and, therefore, out of the category of public domain lands; this area has been reacquired by the BLM, and thus is back in the public lands but now under the category of acquired lands.

The increasing pressure on coastal resources due to California's population growth, increasing levels of coastal activity, and presence of wildlife species with very restricted habitat availability were among the reasons cited for designation of the rocks and islands as a monument in 2000. This designation heightens awareness of the national value of the resources and provides BLM a mechanism to better coordinate federal, state, and local management activities associated with the monument. Many of the regulations needed to manage the resources are already in place; therefore, this plan is not proposing any new regulations, nor does it alter the management jurisdictions that already exist along the coast.

California's mainland, adjacent to the CCNM's rocks and islands, lies within the jurisdiction of five BLM field offices, 15 coastal counties, and dozens of local communities.

California's mainland, adjacent to the CCNM's rocks and islands, lies within the jurisdiction of five BLM field offices, 15 coastal counties, and dozens of local communities. Approximately 25 percent of the coastline off California's mainland is contained within state park units administered by DPR. Multiple other federal, state, and local jurisdictions and regulatory authorities influence access to, use of, and protection for the resources of the CCNM. This multitude of government agencies and public interest groups that have high interest in the California coast provides a vast array of partnership opportunities for BLM as it manages the CCNM. The presence of these varied jurisdictions has played a key role in development of a management strategy for the monument.

The RMP was prepared using BLM's planning regulations and guidance issued under the authority of the Federal Land Policy and Management Act of 1976 (FLPMA). An EIS was prepared for the plan to comply with the National Environmental Policy Act of 1969 (NEPA), the Council on Environmental Quality (CEQ) regulations for implementing NEPA (40 Code of Federal Regulations 1500–1508), and the requirements of BLM's NEPA Handbook 1790-1.

ES.3 Purpose and Need

The purpose of the RMP for the CCNM is to establish guidance, objectives, policies, and management actions for the lands of the CCNM. The RMP identifies and attempts to resolve a wide range of resource and land use issues through a series of long- and short-term management practices that can be cooperatively pursued by BLM and its core-managing partners, DPR and DFG. The RMP also identifies management actions that can be taken by a much broader group of partner agencies and entities with stewardship or regulatory interests in California's coast. The RMP is not intended to supersede or materially modify current or future uses of the adjacent lands, water, or air that are managed by other entities and are subject to existing law and regulation.

The purpose of the RMP for the CCNM is to establish guidance, objectives, policies, and management actions for the lands of the CCNM.

ES.4 Issues

BLM has participated in an extensive dialogue regarding coastal issues with its managing partners, potential partners, and the public-at-large through meetings, distribution of printed media, and electronic communications. This dialogue has allowed BLM to identify key resource and land use issues that are addressed in the CCNM Proposed RMP. The resources and uses to be managed under the RMP are listed in the text box below.

BLM has participated in an extensive dialogue regarding coastal issues with its managing partners, potential partners, and the public-at-large.

The central planning issues for these resources and uses are centered around five management questions that were raised in the early phases of plan development. These questions are:

- How will the plan contribute to protection of biological resources?
- How will the plan contribute to protection of geologic, cultural, and visual resources?
- How will BLM coordinate its CCNM planning and management activities to be consistent with the numerous jurisdictions that have existing plans and policies associated with the coastal zone?
- What programs, facilities, infrastructure, and partnerships are needed to provide the public with interpretive and educational material regarding the values and significance of the CCNM?
- How will people's activities and uses along the coast be affected by management of the CCNM?

RESOURCES AND USES TO BE MANAGED UNDER THE RMP

- Geologic, Soil, and Paleontologic Resources
- Cultural Resources
- Vegetation Resources
- Wildlife Resources
- Visual Resources
- Recreation
- Education and Interpretation
- Research
- Land Use Authorizations
- Land Tenure Adjustments
- Special Management
- Cadastral Support

Because of the unique nature and location of the CCNM, and restrictions contained in the Presidential Proclamation that established the monument, this RMP does not address the following resource and land use issues:

- Wild horses and burros, or
- Fire management.

ES.5 Proposed Resource Management Plan

ES.5.1 Vision, Mission, and Goals

BLM and its core-managing partners have developed a clear vision, mission, and goals for the CCNM RMP, guided by the Presidential Proclamation that established the monument and the input received from agency personnel and the public through the planning process. These guiding principles are as follows:

Vision: The California Coastal National Monument is:

- A spectacular interplay of land and sea;
- A healthy and safe haven for flora and fauna that contributes to the integrity and richness of California's coastal environment;
- An inspiration to visitors to appreciate and protect coastal ecosystems; and
- A catalyst for fostering cooperative stewardship of the monument's resources and California's coastal ecosystems.

Mission: To protect and foster an appreciation for and a stewardship of unique coastal resources associated with the California Coastal National Monument.

Goals:

Goal 1: Protect the geologic formations and the habitat that they provide for biological resources of the CCNM.

Goal 2: Protect the scenic and cultural values associated with the CCNM.

Goal 3: Provide and promote research opportunities to understand the resources and values of the CCNM.

Goal 4: Provide the public with interpretive information and educational initiatives regarding the values and significance of the CCNM and the fragile ecosystems of the California coastline.

Goal 5: Coordinate planning and management activities with the numerous jurisdictions on and adjacent to the CCNM, and use the CCNM to help enhance cooperative and collaborative initiatives and partnerships with a variety of communities, agencies, organizations, academic institutions, the public, and other stakeholders.

ES.5.2 Management Framework

The proposed RMP is composed of two levels of actions, one that describes the detailed areas of allocation and management, and a second that forms an overarching umbrella of management. The framework that BLM will use to manage the CCNM is the overarching guidance needed to direct more specific actions in the future. The management framework is anchored in the guidance provided in the Presidential Proclamation that established the monument. It focuses all actions toward protection of CCNM resources but clearly recognizes that existing withdrawals, reservations, and appropriations of BLM lands will not be affected by the RMP. The framework also makes it clear that establishment of the

CCNM does not enlarge or diminish the jurisdiction or authority of the State of California or the United States over the waters and submerged lands that surround the monument's rocks and islands.

KEY ASPECTS OF THE MANAGEMENT APPROACH

To carryout the mission and accomplish the overall vision for the CCNM, attention will be paid to four equally important aspects of the management approach—preservation, landscape, partnerships, and communities. Figure ES-1 summarizes the key aspects and focus of the management approach to the CCNM.

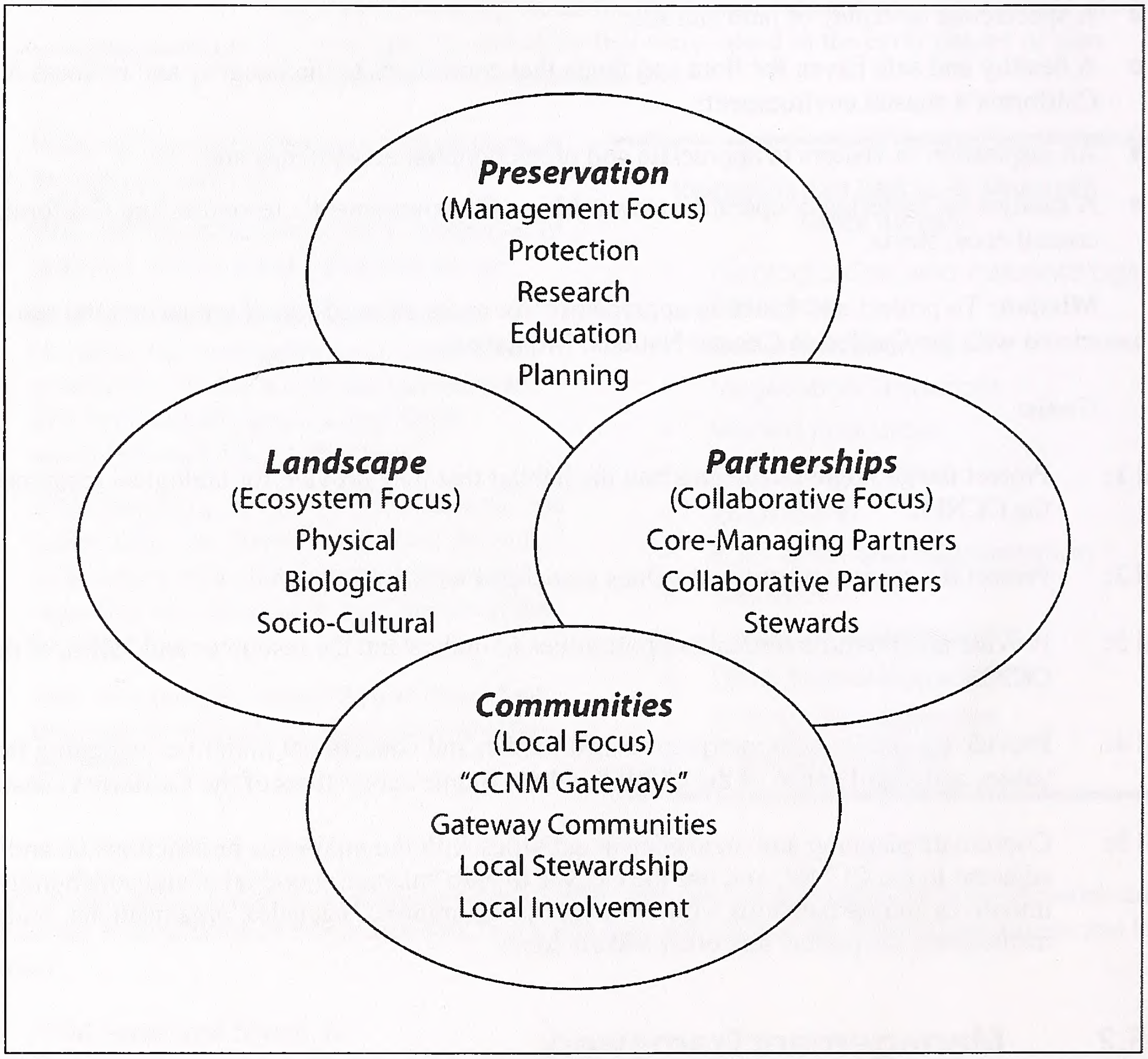

Preservation
(Management Focus)
Protection
Research
Education
Planning
Landscape
(Ecosystem Focus)
Physical
Biological
Socio-Cultural
Partnerships
(Collaborative Focus)
Core-Managing Partners
Collaborative Partners
Stewards
Communities
(Local Focus)
"CCNM Gateways"
Gateway Communities
Local Stewardship
Local Involvement

Figure ES-1
Major Aspects and Focus of the CCNM

Preservation (Management Focus)

Preservation is the primary management focus for the CCNM. This focus applies directly to the more than 20,000 rocks and small islands that make up the CCNM (i.e., the portion above mean high tide).

Four major elements constitute this management focus: protection, research, education, and planning. These elements and their interrelationships are described below.

PROTECTION

As stated earlier, the primary focus of the CCNM is the protection of rocks and islands, and their geologic, biological, and cultural resources and related values as identified in the Presidential Proclamation. For this reason, other management priorities as established by BLM's multiple-use mandate under FLPMA have been determined to be secondary to this purpose.

RESEARCH

Research and scientific monitoring are critical elements in management of the CCNM, as they are the first steps to more clearly understanding the significance and extent of the resources that the CCNM is intended to protect. Agencies, public interest groups, and coastal researchers have emphasized the importance of the research aspect of CCNM management and have indicated interest in being actively involved in covering the gaps in the understanding of coastal resources and resource issues. Encouraging and coordinating research related to the coast and ocean interface (i.e., the "sea-land connection") will be a key aspect of implementing the CCNM RMP. Coordination with the collaborative partners listed below will help to develop long-term monitoring strategies that are compatible with existing databases and that encourage better understanding of the coastal ecosystems.

EDUCATION

Education and associated public outreach form an important element around which effective management of the CCNM has been developed. The first task of this element is the continual effort to increase awareness of the CCNM, including what it is and what it is not. A second task of this element is linking CCNM education efforts with the numerous education initiatives that already exist regarding the various coastal and marine resources of California. The third task is to take advantage of existing and future partnerships and infrastructure, as well as cost-sharing opportunities to provide for cost-effective interpretation of CCNM resources.

PLANNING

Implementation of the RMP will involve development of additional, much more specific activity plans. A major challenge to implementing these plans will be coordinating with the wide range of other agencies whose jurisdictions overlap or are adjacent to the lands of the CCNM. With 15 general land use plans for the California coastal counties, over two dozen local coastal programs, various State Park general plans, the marine protected areas anticipated to be derived from the Marine Life Protection Act (MLPA) process, four National Marine Sanctuary plans, and numerous other plans affecting activities along the California coast, simply coordinating with these plans and planning initiatives will result in a substantial workload. BLM and its core-managing partners are dedicated to making the coordination of coastal plans a part of their CCNM management approach.

Landscape (Ecosystem Focus)

Landscape is the ecosystem focus of the second management aspect of the CCNM. It is the more than 14,600 square nautical miles within which the CCNM is located (i.e., from the mean high tide line out 12 nautical miles along the entire 1,100 miles of the California coastline). As stated in the Presidential Proclamation, the CCNM contains "irreplaceable scientific values vital to protecting the fragile ecosystems of the California coastline." The landscape aspect connects the CCNM with the various ecosystems of which its rocks and small islands are an important part. The landscape links the CCNM with the many jurisdictions and management responsibilities that together ensure the proper management and long-term protection of the California coastal and marine resources and values. The landscape also links the CCNM with its current and future partners, as well as with the public. In addition, the landscape provides the opportunity for using the CCNM as a focal point for the sea-land connection that can help link coastal initiatives with marine initiatives.

To provide a complete ecological perspective to the landscape aspect of the CCNM and effectively manage the monument, all three of the basic dimensions of an ecosystem—physical, biological, and socio-cultural—need to be taken into account. Working to understand the interconnectedness of all three of these dimensions and to continue to apply the growing knowledge of this interconnection will be a key aspect to successfully managing the CCNM. Anything within the landscape can be placed within one of these three ecosystem dimensions. Each of these ecosystem dimensions (based on P. N. Manley et al. 1995) is briefly discussed in the following text.

PHYSICAL (ABIOTIC)

The physical dimension is made up of all of the non-organic, abiotic elements of an ecosystem. This consists of the non-living material components of the environment, such as rocks, water, and air; and can include the topography, geology, climate, nutrients, and hydrology.

BIOLOGICAL (BIOTIC)

The biological dimension is made up of all the living or biotic elements of an ecosystem. This includes all plants and animals, and involves food webs, microbes, and diseases.

SOCIO-CULTURAL (CULTURAL)

The socio-cultural dimension consists of those elements of an ecosystem dealing with the origin, development, organization, and functioning of human societies and cultures. This includes all human-made modifications of the environment, current and past; and involves land uses, economics, beliefs, life style, and social groups.

PARTNERSHIPS

Core-Managing Partners. BLM, DFG, and DPR serve as CCNM's core-managing partners.

Collaborative Partners. Collaborative partners will serve to help implement various aspects of resource programs related to the monument.

Stewards. Stewards will be select entities with ownership or management responsibility for a specific portion of the coast that adjoins part of the CCNM.

Partnerships (Collaboration Focus)

Partnerships provide the collaboration focus for the CCNM. Because the CCNM spans the entire length of California's coastline, management of the CCNM provides unique opportunities and challenges. The CCNM is located adjacent to or embedded within many jurisdictions, including lands and waters reserved, owned, or administered by the Department of Defense (DoD), U.S. Coast Guard (USCG), National Parks Service (NPS); the National Oceanic and Atmospheric Administration (NOAA) (which manages the four offshore marine sanctuaries); U.S. Forest Service (USFS); U.S. Fish and Wildlife Service (FWS); DPR; California State Lands Commission (SLC); private landholdings; 15 coastal counties; and numerous cities, communities, municipalities, and tribal jurisdictions.

The Presidential Proclamation makes it clear that the CCNM will remain under federal ownership and directs the Secretary of the Interior to manage the CCNM through BLM. Nevertheless, BLM needs to continue existing partnerships with other governmental agencies and private entities, while also pursuing new collaborations, to effectively implement management of the CCNM. To address the wide array of partnership opportunities, both existing and potential, three basic partnership categories have been established: core-managing partners, collaborative partners, and stewards.

CORE-MANAGING PARTNERS

BLM, DFG, and DPR serve as CCNM's core-managing partners. These agencies are responsible for the oversight and day-to-day management of the entire CCNM. Through the interim MOU signed in spring 2000, BLM extended its partnership with DFG and added DPR, the state agency that administers 25 percent of California's mainland coast. Other partners may have specific interests and involvement in specific parts or program aspects of the CCNM, but the core-managing partners have the responsibility for the overall management of the entire CCNM. In concurrence with the interim MOU and the Presidential Proclamation that established the CCNM, BLM will function in a primary role in administration of the CCNM; but the intent is to involve DFG and DPR in management of the entire CCNM as much as possible and practical. The MOU is included as Appendix B.

The MOU under which this management partnership operates specifically states that the three agencies will:

- Collaborate in management of the CCNM,
- Authorize uses in the CCNM only following consultation among the parties,
- Work as partners in preserving the objects of historic and scientific interest for which the CCNM was established,
- Work on mapping and understanding the resources in the CCNM, and
- Work with the public to explain the values of the CCNM.

All three core-managing partners are resource management agencies with statutory and regulatory authority that allows them to operate within the entire area of the CCNM. Although each of the agencies has its own unique authorities, collectively these three agencies can provide the needed management for the CCNM. BLM does not anticipate adding any other core-managing partners. The involvement of other entities with management of the CCNM will be formalized through the use of the other two partnership categories.

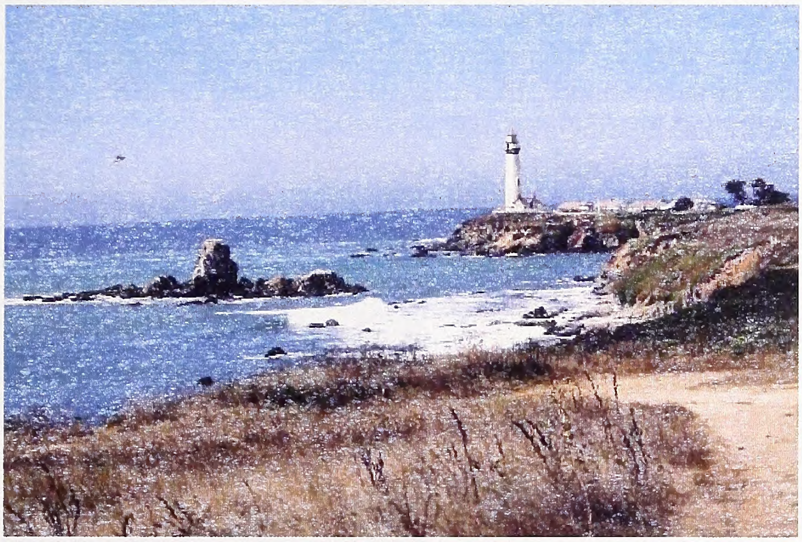
It is anticipated that, as the planning and management for the CCNM moves into the implementation stage, the field-level involvement of and coordination among the core-managing partners—as well as the other CCNM partners—will become progressively more active. Local involvement of the CCNM's partners will be a key to the monument's future success.

COLLABORATIVE PARTNERS

Collaborative partners will help to implement particular resource/use program areas throughout the monument. Most of the partnerships related to the CCNM will fall into this category. Collaborative partnerships will be developed with a wide variety of governmental, tribal, and private organizations and entities. These partners have specific interests or responsibilities that, when linked with the CCNM, enhance both the monument's purpose and the mission, goals, and purpose of the collaborative partner. These partnerships will include entities that oversee similar resources (e.g., seabirds or tidepools), have program-related interests (e.g., maritime heritage or marine protected species), are involved in a related activity (e.g., research or education), or oversee adjacent locations (e.g., an area within a National Marine Sanctuary). Collaborations could take the form of joint ventures with multiple participating partners.

STEWARDS

This partnership category is for select entities with ownership and management responsibility for a specific portion of the coast that adjoins part of the CCNM. These partners agree to serve as stewards for that portion of the CCNM. Stewards will work with BLM and other partners to help in management of a portion of the CCNM that is offshore of the steward's onshore property. Examples of potential stewardship partners include Vandenberg Air Force Base (Santa Barbara County), the Town of Trinidad (Humboldt County), Crescent City Harbor District (Del Norte County), the Pebble Beach Company (Monterey County), and possibly some individual private landowners or landowner associations.



A stewardship agreement will be developed with each approved steward. Each agreement will identify the specific portion of the CCNM for which the steward will assist in long-term management, as well as outline the expected roles and responsibilities of a steward while working with BLM and its various CCNM partners.

Communities (Local Focus)

The final focus on communities has been chosen to help develop community involvement and a sense of community "ownership," which will aid in effectively managing the CCNM. As part of this focus, the establishment and initiation of a series of "CCNM gateways" will be completed. CCNM gateways are sections of the California coast that serve as visitor contact points or portals for the CCNM—areas, towns, cities, communities, or various locations that are ideal for providing visitor information and services—and have the infrastructure and interest in serving in this capacity. CCNM gateways also will be the vehicle to establish a local "flavor" for a specific portion of the CCNM, provide local stewardship, and create a sense of place for the monument.

PLAN IMPLEMENTATION PRIORITIES

The following three priorities for management of the CCNM have been identified:

- **Protecting CCNM Resources and Resource Values.** Although the CCNM manager has the responsibility of overseeing the protection of the monument, day-to-day responsibility for resource protection will lie with the five BLM coastal field offices (Arcata, Ukiah, Hollister, Bakersfield, and Palm Springs/South Coast) and with core-managing partners—DFG and DPR—in addition to any arrangements with other partners (e.g., stewards).
- **Developing and Maintaining Partnerships.** This effort is a key part of the long-term management of the monument and will help support and be linked with all other aspects of CCNM management.
- **CCNM Site Characterization.** A comprehensive site characterization will be critical to identifying the resources that comprise the CCNM, as well as the important locations, resources,

and values that the monument aims to protect. It also will enable BLM to organize research and monitoring needs, gaps, and opportunities; discuss the CCNM in terms of its physical, biological, and socio-cultural dimensions; begin developing the CCNM's public education and interpretive initiatives; and establish a public, accessible, web-based site.

BLM has selected three initiatives on which to focus initial management actions. These three initiatives are (1) CCNM Gateways, (2) Seabird Conservation, and (3) Tidepool Connections. Although initial management may not focus exclusively on these three initiatives, they represent the initial priorities and will override other potential initiatives until additional funding and staffing becomes available for CCNM management. Each of these three initiatives is described in more detail below. In addition, the descriptions of the management actions below contain additional information about CCNM management that is relevant to the three initiatives.

CCNM Gateways

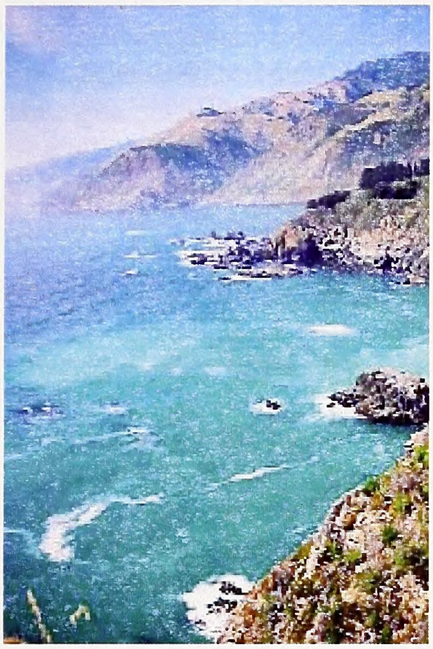
CCNM gateways will be located at various points along the California coast. They are intended to provide a sense of place for this unique monument, bring the monument into focus, and link the CCNM with local communities and local initiatives. The locations selected as gateways will provide multiple opportunities with a variety of partners and potential partners and will serve as the CCNM's key contact points. As an important part of the implementation of this key aspect of the long-term management of the CCNM, two to four CCNM gateways could be rolled-out per-year over the first 3–5 years of implementing the CCNM RMP.

The first five priority CCNM gateways include one in each of the five BLM coastal field offices. A proposed implementation schedule is as follows:

2006	Piedras Blancas/San Simeon (Bakersfield Field Office [FO]), Point Arena (Ukiah FO), Pigeon Point (Hollister FO), Lost Coast (Arcata FO), and Palos Verdes Peninsula (Palm Spring/South Coast FO)
2007	Monterey Peninsula (Hollister FO), Elk (Ukiah FO), Trinidad (Arcata FO), and Sonoma Coast (Ukiah FO)
2008	Big Sur (Hollister FO), Mendocino (Ukiah FO), and Crescent City (Arcata FO)

For each CCNM gateway, the following steps will be completed: (1) identification and initiation of the key local partnerships; (2) development of an implementation/marketing plan; (3) identification, enhancement, and/or development of the initial infrastructure for interpretation and visitor contact; (4) development of visitor contact information and media packets; (5) planning and carrying out a roll-out ceremony; and (6) implementation.

Seabird Conservation



Seabirds, shorebirds, and pinnipeds are the most prominent wildlife on the CCNM. Of these, seabirds have received the least attention. Seabirds, as used here, are those species, whether they are coastal, offshore, or pelagic, whose normal habitat and food source is the sea. This term includes species (e.g., pelicans) for which, at certain times of the year, the sea provides their habitat and principal source of food (Harrison 1983). For the CCNM, these include, but are not necessarily limited to, Leach's storm-petrel, ashy storm-petrel, black storm-petrel, fork-tailed storm-petrel, brown pelican, pelagic cormorant, Brandt's cormorant, common murre, pigeon guillemot, Xantus's murrelet, Cassin's auklet, rhinoceros auklet, tufted puffin, and western gull.

While seabird research has increased significantly over the past 40 years, information is limited. Research has substantially increased knowledge about some species (e.g., common murre and Brandt's cormorant), but very little is known about such things as the pelagic dispersal or the breeding areas for some of these species. There is very little information on the status of most of the seabird colonies in the CCNM—especially of the nocturnal and burrow- or crevice-nesting seabirds and of the smaller colonies. Because the rocks and small islands of the CCNM provide important habitat to seabirds for roosting, resting, nesting, breeding, and brooding, the CCNM can help to fill the gaps in the seabird inventories along the California coast and serve as a focal point for seabird conservation initiatives. This could include working with various CCNM partners to coordinate seabird monitoring, research, protection, and public outreach initiatives.

Tidepool Connections

With more than 20,000 rocks and small islands spread along the 1,100 miles of the California coastline, the monument is associated with much of the state's rocky intertidal coastal zone. Therefore, the monument is connected with many of California's unique tidepool areas. Although tidepools exist primarily below mean high tide and are therefore outside the CCNM, some of the pools' features extend above mean high tide and are part of the monument. This linkage demonstrates the interconnecting relationship the CCNM has with the various coastal ecosystems of which it is a part.

Connection with a wide variety of California's tidepools provides the CCNM with the opportunity to serve as the vehicle to help develop and coordinate a California coast-wide initiative related to tidepool education and protection. This may include development and dissemination of a "tidepool etiquette" applicable to the entire coast, common tidepool public education materials, and appropriate signage wording and formats; and establishment of a communication network.

GENERAL MANAGEMENT GUIDANCE

Monument Administration

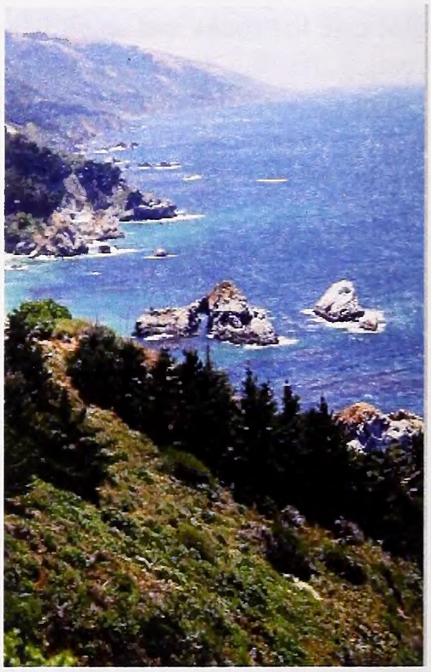
BLM will use its existing operating procedures and guidance documents, and its MOU with DFG and DPR as a base to administer the CCNM. Administration by BLM currently is performed through the

CCNM Manager, stationed in Monterey, California, and working under the Deputy State Director, Natural Resources in BLM's California State Office in Sacramento. The CCNM Manager works closely with the managers of the five California BLM field offices with coastal responsibilities (i.e., the Arcata, Ukiah, Hollister, Bakersfield, and Palm Springs/South Coast FOs). These field office managers have the day-to-day operational responsibilities related to their respective portion of the CCNM. The CCNM Manager has support from various BLM staff members from the five BLM coastal field offices, as well as from BLM California State Office staff members for a variety of resource and administrative functions. Over time, as funding allows, a small core staff will be developed for the CCNM. This will include shared positions with BLM field offices and with partnership agencies.

The interim MOU for the core-managing partners identifies that DFG and DPR will work as partners with BLM in preserving monument resources identified in the Presidential Proclamation, as well as in mapping, evaluating, and communicating with the public regarding these resources. The MOU also requires consultation between the agencies before authorizing uses of the CCNM. To this extent, DFG and DPR also will participate in monument administration. In concordance with the Presidential Proclamation and the MOU, BLM will function in a primary role in monument administration.

Role and Responsibilities of Core-Managing Partners

As mentioned above, BLM has ultimate responsibility for the CCNM and its management. As such, it will serve as the final decision-making authority for actions on the monument, with consultation on major decisions to be conducted with DFG and DPR. DFG and DPR, while having the opportunity to be involved in all aspects of CCNM management, will take more specific roles for managing individual elements of the CCNM as dictated by their respective agency missions and areas of expertise, at a level commensurate with available funding. To this end, DFG will provide support for biological resources management actions. DPR will provide support for recreation and education/interpretation management actions.



Direct and Indirect Management

The RMP identifies management actions that apply only to the individual rocks and islands of the CCNM. Because the rocks and islands are elements of a larger, closely connected coastal ecosystem, activities in the waters and lands adjacent to the CCNM have the potential to affect monument resources. Consequently, in addition to describing the management to be carried out within the CCNM, the RMP includes management direction for participation in activities that could indirectly affect CCNM resources.

SPECIFIC MANAGEMENT APPROACHES

Sub-Unit Identification

Due to the sheer geographic spread and the substantial variability in physical, biological, and jurisdictional conditions along the length of California's coast, the CCNM corridor has been subdivided into 36 individual sub-units. These sub-units were developed as preliminary divisions to facilitate tailored management based on region-specific management issues. The sub-units have been distinguished using a variety of factors, including physiographic variability, presence and absence of CCNM properties, distance relationships between adjacent rock and island groups, and existing management jurisdiction boundaries. Sub-units were developed to serve as the basic unit for planning for the long-term management and use of the CCNM and to allow for distinctions in planning and management approaches, as well as providing the opportunity to create larger sub-units if desired for implementation of RMP actions.

Regionalized Management Approaches and Prototyping

Management of the CCNM is tailored to its coastal location. As discussed above, the CCNM has been divided into smaller sub-units. These sub-units or other logical divisions may be subject to varying management based on the geographic area, density, and character of monument features and associated resources in a given region; the number and engagement of partners; and local community interests and concerns. This site-specific management approach will extend to the implementation actions identified in the plan—in particular, activities related to protection of CCNM resources and recreational, educational, and interpretative programs. To this end, activity plans and associated implementation activities may address smaller geographic areas than the entire CCNM, such as an individual field office or sub-unit.

BLM intends to use prototyping in its early management actions. Prototyping involves implementation of certain management approaches, particularly those that are relatively untested, on small portions of the coast to determine their usefulness, applicability, and potential for success in other specific areas. Highly successful approaches may be extended to the CCNM as a whole.

Public Role

In addition to learning about and appreciating the CCNM, the public has the potential to assist with management of the CCNM and its resources. This assistance may include participating in public advisory groups that will be formed as necessary and appropriate; participating in existing BLM Resource Advisory Committees; and undertaking management roles as part of specific public or private groups through MOUs, following the partnership approach outlined above. In addition, BLM and its partners will continue to encourage establishment of or partnership with existing public foundations and other public groups for funding, interpretation, and education.

Regulations

The CCNM currently is managed under a variety of federal and state laws and regulations, including regulations that provide for protection of CCNM resources. FLPMA, ESA, MBTA, and MMPA are the principal bases for federal protection. From the state perspective, the California Code of Regulations, Title 14, Section 630 provides a basis for protection of ecological reserves such as the CCNM. Substantial additional regulation is not considered necessary. In certain cases, however, establishment of duplicative regulation at the federal and state levels may be desirable, as it would provide all three core-managing partners and other enforcing entities equal jurisdiction to enforce regulations. In addition, targeted new regulation may be necessary where existing regulation is not sufficient to ensure adequate protection of CCNM resources. The Approved RMP, when adopted, could identify the possible need for any new regulations that may be required related to specific approved management actions identified.

Law Enforcement

Law enforcement efforts on and adjacent to the CCNM will continue under current jurisdictional limits, using existing legal and regulatory authority. This includes enforcement of restrictions contained in the MOU between BLM, DPR, and DFG for management of the CCNM. BLM also intends to use the CCNM management as a vehicle to increase coordination between enforcement agencies, including DFG, NPS, FWS, USCG, NOAA, local law enforcement entities, and others. The goals of this coordination will be to clarify any existing jurisdictional confusion, improve enforcement of protective laws and regulations, focus enforcement resources on segments of the coast where protection of biological and cultural resources is most needed, and establish MOUs or cooperative agreements as needed to effectively protect the CCNM's resources. This may take the form of a law enforcement workgroup for the CCNM.

Many of the law enforcement issues that exist for CCNM resources are associated with activities that do not take place on the monument itself, such as disturbance of wildlife from mainland activities, water-based recreation, and airplane and helicopter overflights; and emergency response to spills and accidents. While BLM does not regulate or enforce regulations on much of the coastal mainland, in the air, or on the water surrounding the monument, law enforcement staff involved in managing the CCNM will be educated regarding these issues; and enforcement efforts will be coordinated through BLM and/or BLM partner sponsorship of periodic law enforcement conferences at various locations along the coast.

Management Revenue and Expenditures

BLM intends that plan implementation be fully funded and executed in the most cost-effective manner and that revenues to support CCNM management be provided by agency appropriations, grants, donations, and other funding sources. Because resource protection is the principal goal of the CCNM, visitation on the monument's rocks and islands, and use of such visitation as a basis for generating revenue, will not be emphasized.

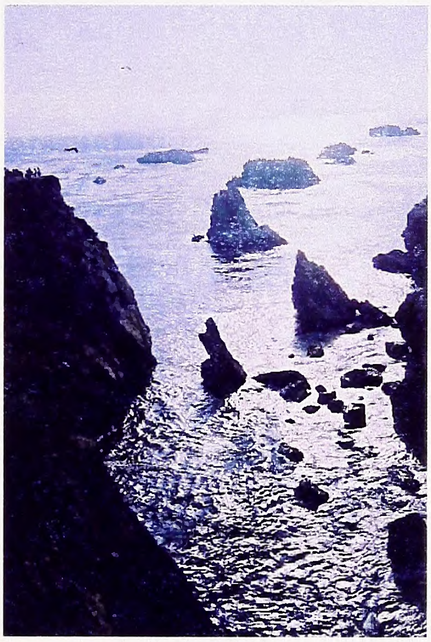
Plan Coordination

As discussed elsewhere, the California coast is the subject of many planning efforts. Similar to law enforcement, BLM intends to use the CCNM as a platform to increase coordination between the variety of plans and planning entities along the coast. As part of this effort, BLM and its partners will develop a protocol to track planning efforts on adjacent and overlapping jurisdictions, and will become involved in advisory and/or participating roles as appropriate to ensure protection of monument resources. In particular, BLM will work with the Marine Region of DFG to ensure coordination between CCNM management and the actions taken under the MLPA as the marine protected areas planning process proceeds over the next few years, and NOAA's National Marine Protected Areas Center related to the implementation of Executive Order 13158.

Publicity

Publicity efforts about the CCNM, its resources, and visitor opportunities will use traditional media tools—including regional, statewide, and national newspapers, magazines, and periodicals; and travel-related television programming, also on regional, state, and national levels. The CCNM also will use cutting-edge technology to reach potential visitors and researchers. Information will be posted on web sites hosted by BLM and CCNM partners, and will be shared through BLM's electronic newsletters. The Virtual Monument will provide interactive means for visitors to "experience" the monument from remote locations (see the discussion under "Education and Interpretation"). Promotional products will include compact discs (CDs), digital video discs (DVDs), posters, shirts, caps, and mugs. These products will be made available at BLM field offices, coastal tourism and visitor centers, community bed and breakfast inns, and similar visitor-oriented businesses. Products also could be provided through BLM- and partner-hosted web sites.

Response to Oil Spills and Release of Other Toxic Materials



As part of CCNM management, BLM will increase its role as a federal trustee agency by furthering its coordination and involvement with the U.S. Department of the Interior's Office of Environmental Planning and Coordination (OEPC). This will involve BLM staff coordinating more closely with OSPR and FWS personnel to help BLM become an active participant in DFG's OSPR Program, and BLM will participate with the U.S. Environmental Protection Agency (EPA) and the USCG in actions associated with the National Oil and Hazardous Substances Pollution Contingency Plan. In its capacity as a federal trustee agency, BLM will participate in these efforts and offer a coordination role through its involvement with multiple jurisdictions, research entities, and resource steward organizations along the entire California coast. BLM staff will become part of spill response teams along the California coast when spills pose a real threat to the biological and scenic resources contained on the monument. BLM also will provide information on the location of important seabird and pinniped habitats associated with the CCNM, and will mobilize staff as appropriate to protect monument resources. The extent of BLM's role in these programs will be modified through the course of its involvement, with primary focus on providing information, coordination, and support to the appropriate spill response agencies regarding the location of key monument resources. In addition to serving as agency and Natural Resource Damage Assessment (NRDA) representatives on the command staff for a specific spill, likely roles for BLM staff include participation within the unified command in the planning section's environmental unit and the operations section's wildlife branch, as well as serving as the Federal On-Scene Coordinator's historic properties specialist.

MONITORING AND ADAPTIVE RESPONSE PROGRAM

Implementation of this RMP will be monitored to ensure that management actions follow prescribed management direction (implementation monitoring), meet desired objectives (effectiveness monitoring), and are based on accurate assumptions (validation monitoring).

Monitoring will be an integral component of adaptive ecosystem management. Close coordination and interaction between monitoring and research are essential for this type of management. Data obtained through systematic and statistically valid monitoring can be used by scientists to develop research hypotheses related to priority issues. Conversely, the results obtained through research can be used to further refine protocols and evaluate the effectiveness of implementation of this RMP. Monitoring results will provide managers with the information to determine whether an objective has been met and whether to continue or modify the management direction. Findings obtained through monitoring, together with research and other new information, will provide a basis for changes to the RMP.

The monitoring process will collect information in the most cost-effective manner possible and may involve sampling or remote sensing. Monitoring activities will be conducted by a variety of entities, depending on the nature of the monitoring. Groups that may conduct monitoring include universities, other research institutions, BLM and other agencies, private organizations, and members of the public. Community-based monitoring conducted by monument stewards will be encouraged through the partnership program and will be integrated with the education and interpretation activities identified in the management actions below.

The objective of resource monitoring and evaluation is a clear understanding of the ecological structures, function, and processes that characterize the CCNM and the effects of human activities on those attributes. Accordingly, the goals for the monitoring and evaluation program are as follows:

- Provide the basis for long-term adaptive management and ongoing planning,
- Assess compliance with environmental laws, and
- Ensure that direction in the Presidential Proclamation is fulfilled.

ES.5.3 Management of Resources

The management framework described above has provided BLM the guidance necessary to develop more specific, resource-focused management actions. The proposed RMP provides specific management direction in six resource categories; each of these categories was identified through the planning process as an important component of CCNM resource values. The plan's objectives, operating framework, management actions, and allowable uses are listed below for each resource category.

GEOLOGIC, SOIL, AND PALEONTOLOGIC RESOURCES

The RMP objectives are to maintain and restore the quality and integrity of geologic and soil resources, and to allow for data recovery where unique paleontologic resources are threatened by natural processes or human activity. The plan encourages research that can better define the value of these resources and provides for four specific actions:

- **Data Recovery.** Where unique paleontologic resources exist that are threatened by natural processes or human activity, allow for excavation and data recovery, if it is determined that this action will not adversely affect sensitive biological, physical, or cultural resources or resource values.
- **Education and Interpretation.** Develop educational and interpretive materials that identify the nature and value of physical resources of the monument.
- **Management Criteria.** Develop criteria for identifying resources requiring protection. Criteria will include, but not be limited to, the unique nature of the resource in question, the sensitivity of the resource to disturbance, and the threat or potential threat to the resource. Identify areas requiring additional management based on the above criteria.
- **Research.** Following any research, maintain an inventory of monument resources.

The plan allows for on-monument activities that would not harm the physical resources of the monument. Existing BLM land withdrawals and guidance contained in the Presidential Proclamation prohibit removing minerals with commercial value from the monument.

CULTURAL RESOURCES

The RMP cultural resource objectives are to protect cultural resources eligible and potentially eligible for listing in the National Register of Historic Places (NRHP); obtain scientifically and ethnographically relevant information from the resources to inform us about past human activities, to evaluate cultural resources, and for site characterization; and offer ongoing interpretation of cultural resources as a means of enhancing public appreciation. The operating framework to accomplish these goals includes the BLM's Statewide Protocol Agreement, which incorporates the BLM 8100 Manual Series; government-to-government consultation with Native American tribes; laws against damage and theft of cultural resources; interpretive opportunities with management partners; research; and cultural resources management plans.

The specific management actions contained in the plan include:

- **Initial Management.** As interim management prior to completion of NRHP eligibility determinations, cultural resources will be managed for their information, public, or conservation values per BLM Manual 8100, FLPMA, and NHPA. Until formal NRHP eligibility determinations are made in consultation with the SHPO, each known resource will be managed as if it were a significant cultural resource.
- **Eligibility of CCNM Properties for Listing in the NRHP.** Prepare nominations as appropriate for cultural resources in the CCNM that are potentially eligible for listing in the NRHP. Obtain a determination of which cultural resources are suitable for listing.

- **Cultural Resources Management Plans.** Cultural resources management plans that address preservation actions may be prepared for cultural properties as determined to be appropriate for management purposes.
- **Consultation with Tribes.** BLM will consult further with Native American tribes to gather information about traditional use areas and activities that may include elements of the CCNM, to support the allowable uses.
- **Education and Interpretation.** An education and interpretation program will be developed around the CCNM's significant cultural properties. The program may include printed and web-based material, and may also involve public events organized around historic or prehistoric themes at or near significant coastal sites.
- **Research.** Research for the purposes of evaluation, site characterization, and scientific investigation is encouraged when such research is consistent with the objectives of the RMP, the Statewide Protocol Agreement, and cultural resources management plans developed under the umbrella of the Protocol.

The plan allows for Native American traditional and interpretive activities on the monument where consistent with resource protection, limits on-monument activities that might harm cultural resources, and specifies that inadvertent or unanticipated discoveries be treated according to the terms of the State Protocol Agreement.

VEGETATION RESOURCES

The plan's management objectives for terrestrial and intertidal vegetation are to maintain and restore the natural quality and integrity of native vegetation on the monument. These objectives will be met by applying a tiered management approach, with the first tier being development of criteria to identify areas needing the most management attention. The second tier is to perform site inventories and to monitor vegetation and human use, directed by application of the criteria from the first tier. The final tier is to implement management actions as needed to protect and restore the vegetation.

The specific vegetation management actions in the plan include:

- **Criteria for Management.** Documentation that harm to a listed plant species is occurring will be an overriding criterion for implementing management action. As an initial step in RMP implementation, additional criteria will be developed for identifying the plant species and communities requiring management and protection. Criteria will include, but not be limited to, the unique nature of the resource in question, the sensitivity of the resource to disturbance, and the threat or potential threat to the resource.
- **Site Inventory.** An inventory of vegetation and vegetation communities will be maintained. As part of the site inventory, BLM will make elimination of the identified gaps in knowledge about the distribution and status of plant species a primary goal. On the basis of the above activities and criteria, BLM will work cooperatively with DFG, DPR, FWS, and other agencies to identify rocks and islands in need of management attention.
- **Adaptive Management.** A variety of management activities may be implemented in the specific areas identified for management, including but not limited to, targeted education, enforcement actions, restoration, and use restrictions.

- **Invasive Non-Native Species Control.** An invasive non-native plant species management and eradication program will be developed, consistent with the long-term protection of native plant communities. An integrated pest management approach will be applied. Control measures primarily will consist of manual and mechanical removal, and use of fire. The use of herbicides will be restricted to specific situations when other alternatives are determined to be infeasible or ineffective.
- **Education and Interpretation.** Develop educational and interpretive materials that identify the nature and value of vegetation resources of the monument.
- **Research.** Following any research, maintain an inventory of monument resources.

The plan does not allow on-monument uses that would result in loss of native plants, unless otherwise permitted through BLM's normal procedures for granting access for research or other activities. Management intervention normally will begin with the least restrictive approach (e.g., use ethics education), with temporary or long-term access limitations implemented on the CCNM as a last resort.

WILDLIFE RESOURCES

The plan's management objectives for wildlife resources are to maintain and restore habitat on the CCNM for marine birds, mammals, and intertidal species. These objectives are to be met by working cooperatively with the wide array of federal, state, and local entities that have management and enforcement jurisdiction over these resources; by using existing regulatory authorities; and by targeting any enforcement actions in important habitat areas with documented use conflicts.

A tiered, adaptive approach to wildlife management will be pursued as described for vegetation resources. Management actions will be implemented only where there is a high risk of resource damage or significant wildlife disturbance.

The specific management actions in the plan include:

- **Criteria for Management.** Documentation that harm to a listed plant species is occurring will be an overriding criterion for implementing management action. As an initial step in RMP implementation, additional criteria will be developed for identifying the wildlife species and habitat types requiring management and protection.
- **Site Inventory.** An inventory of wildlife and wildlife habitat will be maintained. As part of the site inventory, BLM will make elimination of the identified gaps in knowledge about the distribution and status of seabirds and pinnipeds a primary goal. The inventory will be accomplished through BLM activities and through partnerships. Based on the above activities, BLM will work cooperatively with DFG, DPR, FWS, and other agencies and partners to identify rocks and islands in need of management attention.

- **Adaptive Management.** A variety of management activities may be implemented in the specific locations identified for management, including but not limited to targeted education programs, enforcement actions, restoration, and use restrictions.
- **Invasive Non-Native Species Control.** A program for control and eradication of invasive wildlife species on the CCNM rocks and islands will be developed and implemented where effects on native populations of marine birds and mammals, and other monument resources, have been documented or are suspected.
- **Restoration Measures.** BLM, in cooperation with its core-managing partners, will develop and implement measures to restore or improve habitat and to control predators.
- **Education and Interpretation.** Educational and interpretive materials will be developed that identify the nature and value of wildlife resources of the monument.

Allowable on-monument uses under the plan include those uses that will minimize or eliminate harm to wildlife resources. Activities with the potential to disturb wildlife will be closely managed, and actions may be taken to reduce disturbance. Management intervention normally will begin with the least restrictive approach (e.g., use ethics education), with temporary or long-term access limitations implemented on the CCNM as a last resort.

VISUAL RESOURCES

The plan's objectives for visual resources are to manage all lands as VRM Class I (except where navigational aids are needed for public safety) and to enhance opportunities for coastal visitors to view the scenic character of the CCNM. BLM will work with coastal jurisdictions to ensure that development does not detract from scenic views and will locate and design any CCNM-related facilities on the mainland such that views are not adversely affected.

Specific management actions related to visual resources include:

- **Visual Contrast Ratings.** Complete visual contrast ratings for existing CCNM facilities, identify opportunities to reduce existing visual impacts through modifications, and complete visual contrast ratings for all proposed surface-disturbing activities.
- **Inventory of Vista Points.** Complete an inventory of existing and potential key scenic vista points along road and trail corridors adjoining the CCNM, and identify opportunities to work with core-managing and collaborative partners to improve these locations as overlooks and interpretive sites available to the public.

The plan allows uses on BLM lands that do not detract from coastal vistas. It also allows for navigational aids on the monument where there is no alternative location that would meet the public safety needs.

ES.5.4 Management of Resource Uses

The proposed RMP provides specific management direction in seven resource use categories; each of these categories was identified through the planning process as an important component of CCNM management. The plan's objectives, operating framework, management actions, and allowable uses are listed below for each resource use category.

RECREATION

The proposed RMP limits its discussion of recreation management to activities that occur on the CCNM itself. BLM does not have jurisdiction to regulate activities in the water, land, or airspace surrounding the CCNM. The objectives of recreation management are to provide a use strategy with an appropriate level of recreation access to the monument; provide for non-mechanized, minimal-impact recreation; and minimize construction of new recreation facilities on the monument. The framework for achieving these objectives emphasizes participation in activities that are protective of coastal resources and that minimize public safety risks. BLM does not have the authority to regulate recreation outside the boundaries of the CCNM, but BLM will work with those entities that do have jurisdiction to ensure that recreation does not adversely affect CCNM resources.

The plan's recreation management actions include:

- **User Experience.** The recreation approach for the monument will consist of primitive non-motorized, non-mechanized activities.
- **Recreational Facilities.** BLM will place recreation facilities on the monument only when consistent with the resource protection goals of the plan.
- **Signage.** Signage will be installed at key locations along the mainland regarding the allowed and prohibited recreational uses of the CCNM. Warning signs may be provided in hazardous areas with high visitation or acute risks.
- **Research.** An inventory will be maintained for information generated by any recreation-related research.
- **Educational Materials.** Educational and interpretive materials will be developed that identify the nature and value of recreational opportunities of the monument.

Recreational uses of the monument will be allowed when consistent with the primitive non-motorized, non-mechanized goals and when consistent with proclamation goals and public safety concerns. Management intervention normally will begin with the least restrictive approach (e.g., use ethics education), with temporary or long-term access limitations implemented on the CCNM as a last resort. The allowable uses described below further elaborate on allowed and restricted uses.

- **Recreational Facilities.** BLM will consider placing recreation facilities on the monument only when consistent with the resource protection goals of the plan.
- **Organized Activities and Events.** Organized recreational activities and events will be allowed only through issuance of a special use permit and only when consistent with the plan's resource protection goals.
- **Fishing.** Fishing from the CCNM shall be allowed in accordance with the general fishing regulations. No person fishing from the CCNM shall take fish for commercial purposes except by permit.
- **Motor Vehicles and Off-Highway Vehicle (OHV) Use.** No person shall drive, operate, leave, or stop any motor vehicle, bicycle or other type of vehicle on the CCNM. The entire CCNM is designated as closed to vehicle travel under the BLM OHV regulations.
- **Firearms.** No person shall fire or discharge any firearm, bow and arrow, air or gas gun, spear gun, or any other weapon of any kind within or into the CCNM—or possess such weapons within

the CCNM—except law enforcement personnel and as provided for in individual area regulations that allow for hunting.

- **Camping.** No person shall camp within the boundaries of the CCNM, for both public safety and resource protection reasons.
- **Use of Fire.** No person shall light fireworks or other explosive or incendiary devices, or start or maintain any fire within the boundaries of the CCNM, except for management purposes as provided for in other portions of this plan.
- **Aircraft.** No person shall use the CCNM as a launching or landing point for hang gliders, paragliders, ultralights, or motorized aircraft.
- **Pets.** Pets, including dogs and cats, are prohibited from entering the CCNM unless they are retained on a leash of less than 10 feet.
- **Rock Climbing.** Unless authorized as part of a research, restoration, or facilities installation or maintenance (e.g., aids-to-navigation) project, rock climbing using assistive devices is prohibited within the boundaries of the CCNM, for both public safety and resource protection reasons.
- **Non-Traditional and Newly Emerging Recreational Uses.** Non-traditional and newly emerging recreational uses will be allowed as long as they are consistent with CCNM goals. Such uses will be monitored to assess potential conflicts, impacts on resources, or visitor safety issues.

EDUCATION AND INTERPRETATION

The plan's objectives include provision of year-round, outstanding education and interpretation opportunities, leveraging partnerships with existing programs to foster understanding, appreciation, and stewardship of CCNM and California coastal ecosystems resources. Existing mainland facilities will be used to the maximum extent feasible, and the programs will encourage contact between visitors and managing agency personnel to promote environmental education and protection of CCNM resources and resource values. The Virtual Monument will be an important element of the education and interpretation program. This will include a web site that provides information about the monument's natural and cultural resources, its recreational amenities and access points, and travel information.

The plan's education and interpretation actions include:

- **Educational and Interpretive Facilities.** BLM will place educational and interpretive facilities on the monument only when consistent with the resource protection goals of the plan. New mainland facilities will be constructed in a manner consistent with the existing visual character of the coastal environment so as not to detract from existing scenic resources.

- **Educational and Interpretive Plan(s).** Management of education and interpretation at the CCNM will be achieved through the development of an Education and Interpretation Plan, or a series of regional or site-specific plans, that will identify goals, themes, general guidelines, and an action plan for CCNM education and interpretation.
- **CCNM Gateways.** A series of CCNM Gateways will be developed to provide a sense of place for the monument, serve as visitor contact points, and link the CCNM with local communities and local initiatives.
- **Un-Hosted Visitor Sites.** A number of un-hosted visitor sites or "CCNM waysides" may be developed. These could include informational or interpretive kiosks or panels and even nature or viewing trails.
- **Provisions for Facility Construction.** Any facilities to be constructed will be built to applicable standards; management practices and other measures will be implemented to avoid adverse effects on natural resources and the human environment.

RESEARCH

The RMP's main research objective is to encourage and manage a broad range of research that can add to the understanding of CCNM resources without affecting the integrity of those resources and their resource values. BLM intends to take an active role in promoting and coordinating research along the entire California coast by working closely with the many research institutions that specialize in coastal environments. The secondary objective is to consolidate the existing research permitting processes administered by multiple agencies into a single process. The operating framework for achieving these objectives includes development of an active partnership program to fund and undertake detailed characterizations of monument resources.

The plan's research management actions include:

- **Research/Monitoring Permit System.** Research will be permitted throughout the CCNM. Permits will be required for scientific studies on CCNM land that involve field work or specimen collection with the potential to disturb resources. In coordination with the core-managing partners, BLM will develop research/ monitoring permit stipulations that will be used by all three agencies in permitting and sharing research related to the CCNM. The core-managing partners will coordinate and consult on all major research permit decisions.

Research is an allowable use under the plan. Permits may be issued for research after a thorough review of the research goals, strategies, and operational details. BLM may authorize partner staff to carry out official duties without requiring a permit. BLM and partner staff will need to comply with professional standards and conditions normally associated with scientific research/monitoring permits issued by BLM.

LAND TENURE ADJUSTMENTS

The objective of the CCNM land tenure (i.e., administration and ownership) adjustment program is to pursue acquisition of rocks and islands within the monument corridor that are currently held outside BLM jurisdiction but are made available for transfer or acquisition, where those rocks and islands support the resources for which the monument was established. Tenure decisions will be made consistent with FLPMA and other federal statues, regulations, and directives. Acquisition and exchange actions will be taken only with willing private or government parties, and all acquired lands will become part of the CCNM.

The plan's land tenure management actions include:

- **Disposal.** No monument lands are identified for disposal under this RMP.
- **Exchange.** Exchange will be considered where it would further the resource protection purposes of the CCNM and meets the criteria discussed below.
- **Acquisition.** Acquisition of additional properties will be considered where it would further the resource protection purposes of the CCNM and meets the criteria discussed below. During plan implementation, preliminary lists of possible acquisitions will be reviewed and prioritized in cooperation with other resource management agencies along the coast.
- **Decision Criteria.** Land tenure adjustments will be considered on a case-by-case basis, using criteria that include, but are not limited to, the following:
    - Value or significance of biological, cultural, and geologic resources;
    - Threat level to the resources;
    - Opportunity;
    - Cost/funding availability; and
    - Participation of partnering entities.

LAND USE AUTHORIZATIONS

The RMP's land use authorization objective is to authorize rights-of-way, land use permits, and easements on the monument consistent with protection of the monument resources and public health and safety. This objective will be accomplished by granting authorizations in coordination with core-managing partners, per the MOU, and following standard agency operating procedures. Core-managing partners will coordinate to develop a combined process for authorization of activities that occur on the CCNM as well as activities that span multiple jurisdictional boundaries.

The land use authorization management actions in the plan include:

- **Consideration of Applications.** Each application for use of CCNM lands will be considered on a case-by-case basis, considering the potential for the use to affect CCNM resources and the consistency of the use with the goals and policies of this RMP.
- **Provisions for Facility Construction.** Any facilities (e.g., aids-to-navigation) to be constructed will be built to applicable standards; management practices will be implemented that avoid adverse effects on natural resources and the human environment.

Uses of the monument will be allowed consistent with proclamation goals and public safety concerns. The descriptions below further elaborate on allowed and prohibited uses.

The following uses will be allowed on the monument:

- Valid existing rights.
- Emergency uses of the CCNM, such as response to oil spills or hazardous materials releases (including staging for cleanup operations). Expedited approval will be implemented in these events, with provisions included for protection of CCNM resources during operations.
- Filming, if the activity complies with plan provisions. Permits for commercial filming will be required, and the preparation of a NEPA document may be required.
- Special events, if the event meets plan provisions. NEPA documentation and permits will be required.
- Other land uses, such as construction and maintenance of aids-to-navigation and communication facilities for public health and safety, subject to BLM approval. These land uses will require a land use or encroachment permit or right-of-way. NEPA documentation and permits will be required.

The following uses will not be allowed on monument:

- All forms of entry, location, selection, sale, leasing, or other disposition under the public land laws, including but not limited to withdrawal from location, entry, and patent under the mining laws; and from disposition under all laws relating to mineral and geothermal leasing—other than by exchange that furthers the protective purposes of the monument. This includes coal, oil shale, fluid mineral (including oil and gas, tar sands, geothermal resources, and coal bed methane), locatable mineral, mineral material, and non-energy leasable mineral exploration and extraction.
- Forest resource extraction.
- Livestock grazing.
- Appropriation, injury, destruction, or removal of any feature of this monument. Exceptions could include those authorized by permit in association with authorized research or management activities, collection of small amounts of seaweed and invertebrates for personal, non-commercial use, and collection of certain natural materials by Native American Indians under BLM permit. Exceptions will be allowed only when not in violation of the California Code of Regulations and other federal and state restrictions, or for emergency or management purposes.

SPECIAL MANAGEMENT

Special management includes ACECs, back-country byways, national recreation areas, national trails, and lands recognized as having wilderness characteristics. The plan's special management objectives are to maintain special designations on the monument consistent with protection of the monument resources, and to maintain the existing wilderness characteristics associated with the rocks, islands, exposed reefs, and pinnacles so long as they are consistent with the overall management objectives of the CCNM.

The special management actions contained in the plan include:

- **California Coastal ACEC.** After careful evaluation of the resources recognized by the 1990 designation of the California Islands Wildlife Sanctuary as an ACEC, it was determined that their protection would be enhanced by maintaining the ACEC designation. The name of the California Islands Wildlife Sanctuary will be changed to the California Coastal ACEC, and the ACEC designation will be maintained (as a result of the establishment of the CCNM, the California Islands Wildlife Sanctuary was revoked by Public Land Order 7601 in 2004).
- **Other Designations.** Other special designations may occur in the future as warranted, following standard BLM procedures.
- **Wilderness Characteristics.** The monument will be managed to protect its wilderness characteristics. The management prescriptions to protect wilderness character are consistent with the direction found within the Presidential Proclamation designating the CCNM.

CADASTRAL SUPPORT

The plan's cadastral support objective is to conduct cadastral surveys for new land exchanges or other changes in ownership. Many small rocks and islands under BLM jurisdiction along California's coast are not fully recorded and mapped. In some areas, jurisdiction between various federal, state, and local entities overlaps and land ownership is in question. Resolving these jurisdictional uncertainties will be a long-term goal of BLM, as it will help to improve long-term management of coastal resources.

The management actions associated with cadastral support include:

- **Clarification of Ownership.** BLM will continue efforts to clarify land ownership where ownership is unknown, believed to be inaccurate, or in dispute.
- **Changes in Ownership.** Changes in land ownership status of rocks and islands under CCNM jurisdiction will be documented through surveying so that the geographic extent of land use decisions in this plan is clearly understood.
- **Survey Strategy.** A survey strategy will be developed to guide cadastral work for the CCNM. Priority areas for surveying and mapping will be developed, and a time frame for completion will be specified.

ES.6 Public Involvement

As indicated earlier, this RMP planning process and BLM's decision-making process are guided by the requirements of NEPA, CEQ regulations, and directives from the Department of the Interior and BLM. All of these guidance directives require a significant public involvement program to support the planning process. The public involvement program for the CCNM RMP was initiated through scoping meetings in coastal communities and continued through public release of a Draft RMP/Draft EIS.

The public initially was notified of the CCNM planning process through publication of a *Federal Register* notice on April 24, 2002. This notice was followed by an announcement of scoping meetings. The announcement was sent to over 450 individuals, organizations, Native American groups, and government agencies. A news release regarding scoping was forwarded to over 500 media outlets in the 15 California coastal counties. The public scoping period extended from April 24, 2002, to October 25, 2002.

BLM contacted and established local sponsors for each of its scoping meetings in an effort to heighten local awareness of the opportunity for public involvement. The locations, dates, and local sponsors for the scoping meetings are as follows:

- Bodega Bay, August 20, 2002 – sponsored by the Bodega Bay Marine Laboratory, University of California, Davis;
- Elk, August 21, 2002 – sponsored by Elk Business Association;
- Trinidad, August 22, 2002 – sponsored by Trinidad Chamber of Commerce;
- San Diego, August 27, 2002 – sponsored by Scripps Institution of Oceanography, University of California, San Diego;
- Laguna Beach, August 28, 2002 – sponsored by Surfrider Foundation, Laguna Beach Chapter;
- Santa Barbara, August 30, 2002 – sponsored by Santa Barbara Maritime Museum;
- Monterey, September 4, 2002 – sponsored by Monterey Bay National Marine Sanctuary; and
- San Francisco, September 5, 2002 – sponsored by Golden Gate National Recreation Area, National Park Service.

During the scoping process, BLM contacted 46 federal and state agencies, counties, and tribes to solicit interest in participating in the RMP NEPA process as cooperating agencies. So far, three entities have become cooperators in the NEPA process, including DFG, DPR, and the Trinidad Ranchería (a federally recognized tribe).

Following the close of the official scoping period, BLM maintained open channels of communication with agencies and the public through posting of a scoping report, a management situation analysis, and progress notes and updates on the CCNM web site, at http://www.ca.blm.gov/pa/coastal_monument. An agency working group also was established that allowed more than 20 interested entities to participate in periodic planning meetings and provide input into the plan development process. Following release of the Draft RMP/Draft EIS, BLM continued its public involvement program. Seven public meetings were conducted to receive comments on the draft documents.

The dates, locations, and sponsors of these public meetings are as follows:

- Moss Landing, October 14, 2004 – sponsored by Moss Landing Marine Laboratories;
- Point Arena, October 19, 2004 – sponsored by Point Arena Lighthouse Keepers;
- Elk, October 20, 2004 – sponsored by DPR, Mendocino District;
- Trinidad, October 21, 2004 – sponsored by DPR, North Coast Redwoods District;
- La Jolla, October 27, 2004 – sponsored by Scripps Institution of Oceanography;
- Long Beach, October 28, 2004 – sponsored by Aquarium of the Pacific; and
- San Francisco, November 4, 2004 – sponsored by Golden Gate National Recreation Area.

BLM received 174 letters of comment and heard from numerous individuals during the comment period for the Draft RMP/Draft EIS. Those comments were used to revise the RMP and EIS. Public involvement is continuing through the release of this Proposed RMP/Final EIS. During the 30-day period following the release of these documents, the public can file protests to decisions contained in the Proposed RMP. For further information on the protest process, refer to the letter included with each copy of the Proposed RMP/Final EIS.

The public is encouraged to continue to follow the progress of CCNM planning through accessing the monument web site or by contacting the monument manager at the following address:

Rick Hanks
CCNM Manager
U.S. Bureau of Land Management
299 Foam Street
Monterey, CA 93940
(831) 372-6115

Executive Summary – Final Environmental Impact Statement

ES.1 Introduction

The Final Environmental Impact Statement (Final EIS) for the CCNM Proposed Resource Management Plan (RMP) includes all of the comments received on the Draft EIS, responses to those comments, and changes to the impact analysis as needed to respond to comments. BLM received 174 comment letters, including e-mails and response forms, on the Draft RMP/Draft EIS. BLM also received hundreds of comments from the over 200 attendees at the seven public meetings held for the Draft RMP/Draft EIS. The major issues raised in letters, e-mails, and meeting comments are addressed below.

ES.2 Common Comments on Draft RMP/Draft EIS and Master Responses

BLM has reviewed the entire record of comments on the Draft RMP/Draft EIS and has identified three major, recurring concerns. The recurring concerns relate to jurisdictional authority on and adjacent to the monument, criteria used to characterize "sensitive" sites, and the plan's effect on recreational access along the coast. There are significant overlaps in these three concerns, but BLM has developed separate master responses to address each concern.

ES.2.1 Master Response 1, Jurisdictional Authority

BLM received 61 comments related to jurisdictional authority. Nine of the comment letters opposed additional coastal regulations, particularly where they might overlap existing DFG and NMFS regulations for recreational fishing. The recurring themes in the remaining 52 letters included:

- Proposed management actions extend outside BLM jurisdiction, which is limited to rocks and islands above mean high tide (i.e., not including surrounding waters, airspace, and mainland areas).
- Clarify BLM's management jurisdiction (i.e., physical vs. biological resources) and the authorities of other agencies regarding associated resources.
- Clarify that management actions do not extend to boat, surfboard, or kayak fishing in surrounding waters.

- Overlap with existing regulations per DFG, California Fish and Game Commission (CFGC), FWS, and NMFS for water-based activities and/or marine wildlife is a concern.
- Identify the jurisdictional agency for intertidal species and habitat found below mean high tide.
- Clarify the exemption for all DoD activities in the land, water, or air space near CCNM lands.
- BLM lacks regulatory authority to pose restrictions on low-flying aircraft (FAA jurisdiction).
- Adequate management of CCNM lands is already provided by the federal California Rocks and Islands Wildlife Sanctuary, state Offshore Rocks and Pinnacles Ecological Reserve (per MOU), DFG, and Title 14 of the California Code of Regulations.

As stated in Presidential Proclamation No. 7264, the CCNM comprises "all unappropriated or unreserved lands and interest in the lands owned or controlled by the United States in the form of islands, rocks, exposed reefs, and pinnacles above mean high tide within 12 nautical miles of the shoreline of the State of California." To clarify the legal boundaries of BLM management, a new subsection has been added to Chapter 1 in the RMP (Section 1.3.2, "Management Boundaries"). This new section explicitly states that "BLM has jurisdiction over activities and resources on monument lands only. Activities in waters surrounding monument lands are regulated by core-managing partners and/or other agencies with appropriate jurisdiction." This new section contains matrices (Tables 1-1a and b) that clarify the respective jurisdictions of BLM, DFG, DPR, FWS, NMFS, MMS, SLC, California Coastal Commission, USCG, FAA, and others through a listing of potential activities on and adjacent to the monument. A description of BLM's role in management of resources that reside in multiple jurisdictions (e.g., intertidal resources) is provided, as well as reference to existing regulatory processes in place to address the potential activities.

The text of the RMP has been reviewed and edited to ensure that BLM's jurisdiction is clear. For example, management actions for recreational activities in the Proposed RMP (Section 2.3.3, under "Recreation") have been revised to clarify BLM's jurisdiction over activities occurring on monument lands only.

Finally, the discussion of applicable regulations (Section 1.5.2, "Criteria Established by Other Legislative Constraints") has been expanded to include relevant state regulations. Revisions and corrections to the Proposed RMP are contained in Chapters 1 and 2; revisions and corrections to the EIS are located in Chapter 4 of this document.

ES.2.2 Master Response 2, Sensitive Site Characterization

Seventeen comments addressed the characterization of sensitive sites in BLM's planned resource inventory. The substantive comments on this topic related to the definition of sensitive sites, the timing of site characterization, the need for seasonal restrictions, responsibility for enforcement, and need for resource inventory. The recurring themes are summarized below:

- Characterization of sensitive seabird and mammal sites should be undertaken, as it will lead to a knowledge base with which to make informed and effective decisions.

- The definition of sensitive sites should be based on regulatory criteria (i.e., listing as endangered or threatened) vs. subjective determinations by resource specialists.
- Identification of sensitive wildlife resource areas should be based on thorough scientific review (if it shows recreational boating as a concern).
- Clarify what is included in BLM sensitive species and/or CNPS rare species.

The terms "sensitive sites" and "sensitive resources" have been removed from the RMP. The Proposed RMP (Section 2.2.3, "Plan Implementation Priorities" of this document) identifies a site characterization study as a pivotal first-step in BLM management. This comprehensive site characterization will be critical to identifying the resources that comprise the CCNM as well as the important locations, resources, and values that the monument aims to protect. It also will enable BLM to organize research and monitoring needs, gaps, and opportunities; discuss the CCNM in terms of its physical, biological, and cultural dimensions; begin developing the CCNM's public education and interpretive initiatives; and establish a public, accessible, web-based site.

The CCNM was established primarily to protect the geologic formations that provide habitat for plants and animals, including seabirds and marine mammals. In this context, a prioritizing mechanism will be developed to identify sites in need of management attention. Appendix D of the Proposed RMP/Final EIS provides a preliminary list of known sites of seabird and marine mammal use. This list will be used as a starting point and refined to identify sites requiring further management action. Prior to implementing any site-specific management action, additional information will be gathered, such as data regarding the site's value as habitat and the existence of known conflicts related to use of the site. Where important sites are identified as being threatened by current conditions, management actions will be prioritized to prevent loss of resources.

The EIS has been revised (see Section 4.3.2.2, "Special-Status Species and Habitat," in Chapter 4 of this document) to clarify existing regulatory guidance that will guide analysis of important sites. These regulatory guidelines include listing as endangered or threatened by the federal ESA, listing as a BLM-sensitive species by the BLM State Director, or listing as a California Native Plant Society (CNPS)-rare species.

ES.2.3 Master Response 3, Recreational Access

A total of 125 comments addressed issues relating to recreational access. Seventy-four of these letters stated their support for scuba diving, kayaking, clamming, abalone collecting, surf-fishing, and sport fishing along the California coast. Many expressed concern about potential limitations on recreational access. Some stated that recreational fishermen are often stewards of the coastal and marine environments, but commercial fishing practices are harmful or disruptive. Several comments also related personal anecdotes about recreational fishing with family and friends along the coast. The remaining 53 comments identified more specific issues and concerns to be addressed in the Final EIS. The recurring themes of comments on recreational access are presented below:

- The RMP may result in a loss of recreational access along the California coast.
- The RMP should restrict all recreation on the monument.
- BLM should provide for full access to monument lands, including provisions for new boat ramps, restrooms, parking, and commercial vending.

- Multi-purpose management should be sought, not restricted access.
- Some level of disturbance should be tolerated to allow recreational access.
- Exceptions should be made for access as needed to protect human safety.
- Restrictions should be established only in collaboration with DFG, based on scientific findings.
- Limited points of recreational access should be provided, per existing state and local facilities.

BLM intends to manage recreation activities conducted on monument lands only. BLM defines recreation as "The enjoyment of scenery, water, primitive or natural landscape, wildlife, natural phenomena, and archeological and historical sites in one's leisure time." Recreation will be permitted where consistent with the mandates included in the Presidential Proclamation, which emphasizes the protection of resources (e.g., seabird and marine mammal habitat), or where it is consistent with protection of human safety. The Proposed RMP (Section 2.3.3, under "Recreation") has been clarified regarding permissible and prohibited activities within BLM jurisdiction (i.e., on the rocks and islands above mean high tide).

The Introduction of the Proposed RMP (Section 1.3.2, "Management Boundaries") has been revised to describe the activities on and adjacent to the CCNM that are regulated by other agencies. Please also see the discussion of jurisdiction above.

Section 2.2.5, "Monitoring and Adaptive Response Program," in the Proposed RMP (Chapter 2 of this document) identifies an adaptive management approach to preserving monument resources. Protection of wildlife resources will be sought in the least invasive way (e.g., ethics use education); seasonal access restrictions will be implemented in collaboration with core-managing partners DFG and DPR as a last resort. BLM's intent to minimally implement access restrictions on the CCNM for resource protection is clearly stated in the sensitive site characterization discussion above.

A large number of the recreation-related comments were specifically about RMP effects on recreational boating. The major themes in these comments are as follows:

- The RMP will affect recreational access in surrounding waters, including: recreational fishing by boat, surfboard, and kayak; and skin and scuba diving.
- BLM should not diminish existing recreational fishing rights, access, or boating; clarify BLM's intention.
- BLM should add sportfishing, clamming, and tidepooling to the list of low-impact/appropriate activities permitted on the monument.
- The Draft RMP/Draft EIS is not intended to "supercede or materially modify current or future uses (i.e., recreational fishing)…managed by other entities."
- BLM should clarify whether it is instituting a de-facto ban on sportfishing.
- Surfers, divers, and abalone harvesters sometimes use rocks and islands as resting areas for safety concerns.
- BLM should clarify the recreational activities permitted, allowed, and restricted.
- RMP statements that recreational boating disturbs marine mammals, seabirds, or other wildlife are not correct.

BLM will not regulate activities outside its jurisdiction (i.e., below mean high tide and on surrounding water and land) which include, but are not limited to, the use of aircraft, commercial and sport fishing, commercial and recreational boating, commercial and recreational seaweed harvesting, abalone collection, clamming, recreational kayaking, snorkeling, scuba diving, skin diving, and surfing.

BLM will not diminish existing recreational fishing rights, access, or boating, except where conducted from monument lands. Sportfishing, clamming, and tidepooling may be permitted on the monument, unless BLM's site characterization study determines that recreational access is affecting important wildlife resources. Further research will be permitted to ascertain the impacts of recreational boating and other activities on marine mammals, seabirds, or other wildlife.

ES.3 Other Comments

In addition to the three major areas of comment described above, BLM received public input on 17 other areas of concern. These concerns are addressed in the Final EIS as responses to individual comments and are summarized below.

Commercial Fishing Impacts. Comments asserted that commercial fishing activities have far greater impact on monument and marine resources than recreational activities.

Economic Impacts of Fishing. Comments asserted that regulation of recreational fishing activities will have direct economic impacts on coastal economies.

Coordination with MLPA. Some comments expressed support for coordination between MLPA and the CCNM, while others asserted that BLM management actions will not overlap with the marine resources protected under MLPA.

Law Enforcement. Several agencies, including NOAA MBNMS, NOAA NMFS, U.S. Navy, and NPS, commented on the law enforcement jurisdiction.

Native American Rights/Lands. Comments indicated concern about consultation with Native American tribes regarding access to monument lands, and requested more information on Indian Trust Resources.

Public Education. Comments expressed support for a wide array of educational and interpretive programs and facilities.

Public Outreach. Comments expressed concern about the level of effort expended for public outreach and collaboration with non-governmental organizations.

Research Permits/Priority. Comments expressed both support and opposition for the research permitting process proposed in the Draft RMP/Draft EIS. FWS and NMFS Fisheries both commended the proposed permitting process, while the Navy and U.S. Air Force (USAF) warned that approving permits within military training areas would conflict with the DoD mission for those areas. Comments requested that research activities be conducted in ways that do not disrupt wildlife or reduce the wilderness qualities of the monument.

Transportation. The County of Del Norte expressed concern about the RMP's impact on transportation systems, including coastal airports, harbors, and roadway maintenance.

Intertidal Species. Comments questioned whether BLM's jurisdiction includes intertidal species, such as tidepools and mussel flats

Invasive Species. Comments questioned whether BLM's jurisdiction provides for management of invasive plant and wildlife species on the monument.

Cultural Resources. Comments expressed concerns about preservation of cultural resources on the monument. The Navy expressed concern that only ground-disturbing activities (not all activities) need be halted if buried cultural resources are discovered. The Yurok Tribe expressed concern that the cultural sites listed in the EIS were not inclusive of all known cultural sites and that listing sites in the EIS risks disclosure of confidential information.

Definition of CCNM. The Navy questioned how the number of rocks and islands, total acreage, and coastline length for the monument was determined.

Future Plan Revisions. Comments expressed concern about the public outreach process to be undertaken for future Plan revisions. The Navy expressed confusion about how the Plan horizon (10–20 years) relates to future Plan revisions (every 4 years).

Military Access. The Navy, USAF, and USCG all expressed concern about the Plan's impact on military activities and requested clarification that management actions will not affect land, air, or water ranges officially used for military training

Off-Shore Oil/Gas Exploration. Comments expressed concerns about the potential impacts of oil/gas exploration and accidental spills on monument resources.

Shipwrecks. SLC expressed concern about management of shipwrecks and other submerged historical resources.

ES.4 EIS Conclusions

The environmental effects conclusions contained in the Draft EIS have not been substantially changed as a result of public comments. The Proposed RMP management actions will result in beneficial effects on the physical, biological, and cultural resources of the monument by controlling the amount of certain types of human activity on the rocks and islands and by educating recreationists regarding the effects of their actions on these resources. Any restrictions on access to the rocks and islands of the CCNM as a result of implementing the RMP will result in minor adverse effects on recreation activity that takes place on the CCNM. More control on harvesting of intertidal species on the rocks and islands also will result in a minor adverse effect on certain low-income groups that rely on these species as a food source.

Chapter 1. Introduction

Designated by Presidential Proclamation on January 11, 2000, the California Coastal National Monument runs the entire length of the California coast (1,100 miles); lies within a band that extends 12 nautical miles from the shoreline; and encompasses more than 20,000 BLM-administered islands, rocks, exposed reefs, and pinnacles above mean high tide.

Cooperatively managed with other federal, state, and local government agencies; universities; and private interests, the primary purpose of the monument is to protect important biological and geologic values. The islands, rocks, reefs, and pinnacles provide foraging, resting, and breeding grounds for significant populations of birds and sea mammals.

The following chapter provides background information regarding the monument, key planning issues and constraints, and information related to the planning process.

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Chapter 1

Introduction

1.1 Purpose and Need for the Plan

The purpose of the California Coastal National Monument (CCNM) Resources Management Plan (RMP) is to establish guidance, objectives, policies, and management actions for the public lands of the CCNM administered by the U.S. Department of the Interior's Bureau of Land Management (BLM). The RMP attempts to resolve a wide range of natural resource and land use issues within the CCNM area in a comprehensive manner. The document addresses and integrates, where possible, the numerous related management issues of the various current and potential future coastal partners who are included in the planning effort. (The management strategy for the CCNM is described under "Overall Vision.")

In addition to the purposes described above, this joint RMP/Environmental Impact Statement (EIS) fulfills the needs and obligations of BLM as set forth by the Presidential Proclamation establishing the monument (see Section 1.2.4 and Appendix A), the National Environmental Policy Act of 1969 (NEPA), the Federal Land Policy and Management Act of 1976 (FLPMA), and BLM land use plan policy.

1.2 Overall Vision

The following statements identify the vision, mission, and management focus for the CCNM, as well as the RMP goals and objectives. These serve to provide overall direction for the CCNM as the planning and management processes continue, both through implementation of this RMP and into the future.

1.2.1 Vision Statement

The California Coastal National Monument is:

- A spectacular interplay of land and sea;
- A healthy and safe haven for flora and fauna that contributes to the integrity and richness of California's coastal environment;
- An inspiration to visitors to appreciate and protect coastal ecosystems; and
- A catalyst for fostering cooperative stewardship of the monument's resources and California's coastal ecosystems.

1.2.2 Mission Statement

The mission of the CCNM is to protect and foster an appreciation for and a stewardship of unique coastal resources associated with the California Coastal National Monument.

1.2.3 Management Focus

Management options for the CCNM will focus on protection, research, education, and planning through collaboration, cooperation, and coordination with the core managing partners (California Department of Fish and Game [DFG] and California Department of Parks and Recreation [DPR]; see Chapter 5, "Consultation and Coordination," for more information about partnerships) and with other collaborative partners and stewards interested in management of California's coastline. BLM's initial efforts will be geared toward education and interpretation to foster an appreciation for the resource.

Management activities may involve direct management of the CCNM or indirect management through activities that are not located within the boundaries of the CCNM itself (e.g., landside interpretive facilities). In many cases, proposed management of the CCNM will involve prototyping activities, or implementing management practices in a limited area—followed by adaptive implementation of these practices to a wider area, based on the results of the prototype. This topic is discussed in more detail in Chapter 2, "Proposed Resource Management Plan."

The management strategy of the CCNM does not include development of another layer of bureaucracy for coastal management. Instead, the strategy focuses on coordination of the many actions already in place that have been designed to protect coastal resources.

The specific management areas and resource elements for the CCNM were developed through the scoping process, which is summarized in the *Scoping Report for the California Coastal National Monument Resource Management Plan* (Scoping Report) (Jones & Stokes 2003).

1.2.4 Monument Proclamation and Plan Goals

The Presidential Proclamation identified the goal of the CCNM as protection of the resources it contains. To this end, the following goals have been developed for the CCNM, subject to applicable jurisdiction:

Goal 1:	Protect the geologic formations and the habitat that they provide for biological resources of the CCNM.
Goal 2:	Protect the scenic and cultural values associated with the CCNM.
Goal 3:	Provide and promote research opportunities to understand the resources and values of the CCNM.
Goal 4:	Provide the public with interpretive information and educational initiatives regarding the values and significance of the CCNM and the fragile ecosystems of the California coastline.
Goal 5:	Coordinate planning and management activities with the numerous jurisdictions on and adjacent to the CCNM, and use the CCNM to help enhance cooperative and collaborative

initiatives and partnerships with a variety of communities, agencies, organizations, academic institutions, the public, and other stakeholders.

Resource-specific objectives based on these overall goals are presented in the description of the Proposed RMP (Chapter 2—Section 2.2, "Proposed Resource Management Plan").

1.3 Planning Area and Management Boundaries

1.3.1 Planning Area and Map

President Clinton established the CCNM by Presidential Proclamation No. 7264 on January 11, 2000, under the discretionary authority given to the President of the United States by Section 2 of the Antiquities Act of 1906 (34 Stat. 225, 16 U.S.C. 431). Section 2 authorizes the President to declare by public proclamation historic landmarks, historic and prehistoric structures, and other objects of historic or scientific interest that are situated on the lands owned or controlled by the Government of the United States to be national monuments, and to reserve as a part thereof parcels of land, the limits of which in all cases shall be confined to the smallest area compatible with the proper care and management of the objects to be protected.

The rocks and islands of the CCNM are "public lands"[1] owned by the United States and administered by the Secretary of the Interior through the BLM. All of these lands have been "original public domain lands," lands to which title was vested in the U.S. Government by virtue of its sovereignty. As a result of California being ceded to the United States in 1848 after war with Mexico, all of the lands (including the coastal rocks and islands) within California, except for the Spanish and Mexican land grants and private land claims recognized by the U.S. Government, were original public domain lands. Therefore, all of the CCNM rocks and islands, except for one islet[2], have been in federal ownership since 1848.

The purpose of the CCNM, as stated in the Presidential Proclamation, is to protect and manage geologic and biological resources by protecting "all unappropriated or unreserved lands and interest in the lands owned or controlled by the United States in the form of islands, rocks, exposed reefs, and pinnacles above mean high tide[3] within 12 nautical miles of the shoreline of the State of California" (see Figures 1-1a and 1-1b). The proclamation also functions to elevate California's offshore lands to a national level of concern, focuses the primary management vision on the protection of geologic features and habitat for biota, and tasks BLM with the ultimate responsibility for ensuring that protection.

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[1] "Public lands" are any land and interest in land owned by the United States that are administered by the Secretary of the Interior through BLM, without regard to how the United States acquired ownership. The two categories of public lands include (1) public domain lands (i.e., lands to which title was vested in the U.S. Government by virtue of its sovereignty), and (2) acquired lands (i.e., lands in federal ownership that were obtained by the U.S. Government through purchase, condemnation, gift, donation, or exchange).

[2] Sea Lion Rock, located south of Point Arena on the Mendocino County coast, had gone out of federal ownership but has recently been reacquired by BLM. Therefore, the islet is now back in the public lands but under the category of acquired lands.

[3] The Presidential Proclamation does not define the terms "islands," "rocks," "exposed reefs," or "pinnacles." However, these terms are interpreted to include, in sum, all lands exposed above mean high tide. "Mean high tide" (also referred to in this document as "mean high tide line" and "mean high water") refers to the average of all observed high tide heights. The observed height varies at different locations along the coast; as a result, the specific tide height that constitutes the boundary of the CCNM will be variable based on location.

The offshore lands that constitute the CCNM total about 1,000 acres and are in the form of more than 20,000 rocks and small islands[4] (the portion above mean high tide). The largest of these is just over 10 acres and the smallest may be no larger than a square foot.[5]

Spanning the length of California, the CCNM comprises a variety of geologic and topographic features. Some of the islands off the coast and their surrounding rocks and islands were formed through igneous processes—plutonic and volcanic activity. Other nearshore rocks and islands are sedimentary or metamorphic in formation, the result of deposition of geologic material over time and, in some cases, subsequent modification by pressure and heat. The rocks and small islands contained in the CCNM are always changing due to geologic processes—some of these rocks became separated from the mainland because of erosion from wave, wind, and tidal action. These forces will eventually erode certain islands and rocks below mean high tide, and cause other areas currently attached to the shoreline and larger islands to become separated. These features make up the topmost portion of the outer continental shelf, which extends westward of California from just a few miles to over 30 miles. During the Pleistocene Epoch, the shelf was exposed above sea level, defining California's prehistoric coastline some 20,000 or more years before present (BP).

In general, wind and wave action have also determined the physical characteristics of the coastline and its associated CCNM features. North of Point Conception (in Santa Barbara County), strong waves and wind have worked on the California Coast Ranges formations to form numerous offshore rocks and islands. South of Point Conception, however, the coastline is more protected from the impact of storm waves by large offshore islands (i.e., the Channel Islands). The formations of the Transverse and Peninsular Ranges of the south coast have produced fewer rocks and islands.

The biological resources of the monument are influenced by these physical characteristics, as well as by other processes such as climate and ocean currents. Climate along the coastline of California varies, with cooler temperatures, more rainfall, and more extensive cloud cover in the northern portion of the state. Conditions become milder in a continuum southward. The California current, carrying water cooled by its passage through the northern latitudes, flows southward along the shore from the Washington–Oregon border to Southern California, and brings nutrients and biota into the coastal waters[6] surrounding the CCNM.

These rocks, small islands, exposed reefs, and pinnacles are the homes and breeding grounds of many marine and terrestrial species—including birds, fish, and marine mammals. The rocks support a diverse assemblage of rocky intertidal zone plant and animal species. In the area spanned by the CCNM, people enjoy recreational activities such as fishing, kayaking, wildlife viewing, scuba diving, and snorkeling.

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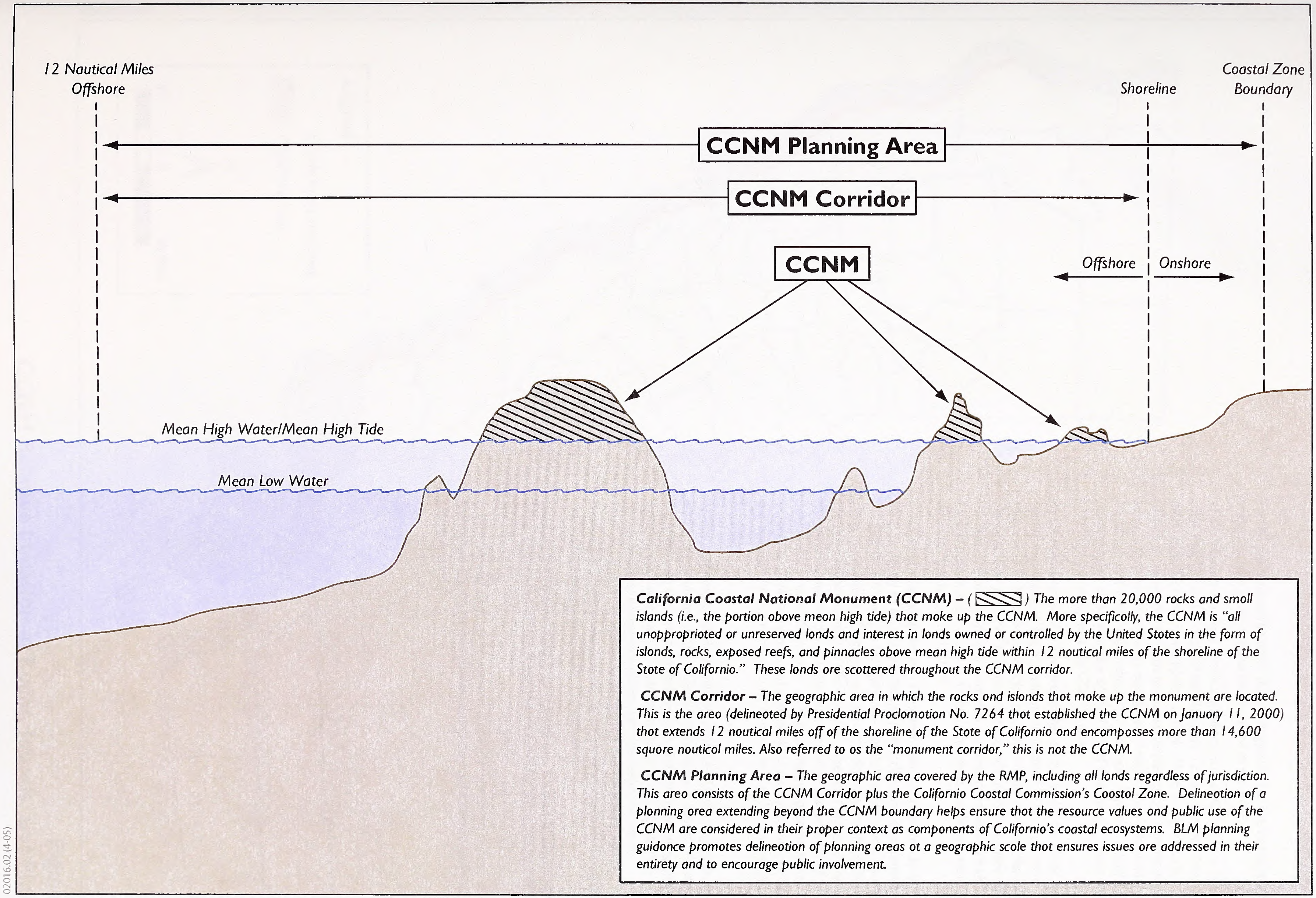
[4] This estimate is based on BLM's initial inventory of the rocks and islands off the shoreline of California that identified more than 12,800 rocks and islands encompassing about 225,000 acres. The smallest consistent rock unit in the data sets used by BLM in the initial CCNM inventory was 4-square meters. Of these, more than 11,000 rocks were identified as being within the CCNM. It can be conservatively estimated that at least another 10,000 rocks less than 4 square meters in size (above mean high tide) are also part of the CCNM. Therefore, it is estimated that more than 20,000 rocks and small islands make up the CCNM.

[5] It also should be noted that over 99 percent of the 225,000 acres of California's offshore rocks and islands is made up of the eight large Channel Islands off the southern California coast and the Farallones cluster off San Francisco Bay that are not part of the CCNM. These larger island clusters, however, represent less than 5 percent of California's total number of offshore rocks and islands. Over 90 percent of California's offshore rocks and islands are within the CCNM.

[6] For the purposes of this document, "coastal waters" refer to those waters within 12 nautical miles of the coast (i.e., those waters that surround the CCNM).



California Coastal National Monument (CCNM) – (▨) *The more than 20,000 rocks and small islands (i.e., the portion above mean high tide) that make up the CCNM. More specifically, the CCNM is "all unappropriated or unreserved lands and interest in lands owned or controlled by the United States in the form of islands, rocks, exposed reefs, and pinnacles above mean high tide within 12 nautical miles of the shoreline of the State of California." These lands are scattered throughout the CCNM corridor.*

CCNM Corridor – *The geographic area in which the rocks and islands that make up the monument are located. This is the area (delineated by Presidential Proclamation No. 7264 that established the CCNM on January 11, 2000) that extends 12 nautical miles off of the shoreline of the State of California and encompasses more than 14,600 square nautical miles. Also referred to as the "monument corridor," this is not the CCNM.*

CCNM Planning Area – *The geographic area covered by the RMP, including all lands regardless of jurisdiction. This area consists of the CCNM Corridor plus the California Coastal Commission's Coastal Zone. Delineation of a planning area extending beyond the CCNM boundary helps ensure that the resource values and public use of the CCNM are considered in their proper context as components of California's coastal ecosystems. BLM planning guidance promotes delineation of planning areas at a geographic scale that ensures issues are addressed in their entirety and to encourage public involvement.*

Figure 1-1a
CCNM in Relation to Mean High Water/Mean High Tide

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For the purposes of the RMP, three categories have been developed to describe the lands and waters discussed in the RMP:

*1) **California Coastal National Monument (CCNM)** – The more than 20,000 rocks and small islands (i.e., the portion above mean high tide) that make up the CCNM. More specifically, the CCNM is "all unappropriated or unreserved lands and interest in lands owned or controlled by the United States in the form of islands, rocks, exposed reefs, and pinnacles above mean high tide within 12 nautical miles of the shoreline of the State of California." These lands are scattered throughout the CCNM corridor.*

*2) **CCNM Corridor** – The geographic area in which the rocks and islands that make up the monument are located. This is the area (delineated by Presidential Proclamation No. 7264 that established the CCNM on January 11, 2000) that extends 12 nautical miles off of the shoreline of the State of California and encompasses more than 14,600 square nautical miles. Also referred to as the "monument corridor," this is not the CCNM.*

*3) **CCNM Planning Area** – The geographic area covered by the RMP, including all lands regardless of jurisdiction. This area consists of the CCNM corridor plus the California Coastal Commission's Coastal Zone. Delineation of a planning area extending beyond the CCNM boundary helps ensure that the resource values and public use of the CCNM are considered in their proper context as components of California's coastal ecosystems. BLM planning guidance promotes delineation of planning areas at a geographic scale that ensures issues are addressed in their entirety and to encourage public involvement.*

Notes:

a) The decisions in this RMP will only apply to BLM-managed lands within the boundary of the CCNM (i.e., category 1 above). All other plan outcomes (i.e., those affecting lands and waters in categories 2 and 3 above) will serve as recommendations to the appropriate agency or entity having jurisdiction over the respective areas. Similarly, outcomes related to BLM lands outside the CCNM boundary will be carried forward as recommendations for incorporation into the appropriate BLM land use plan.

b) While the Channel Islands themselves are not part of the CCNM, some of the rocks off the coast of the Channel Islands are part of the CCNM.

c) The Coastal Zone is all onshore. It is within the Coastal Zone that the CCNM Gateways and CCNM interpretive/educational facilities will be located.

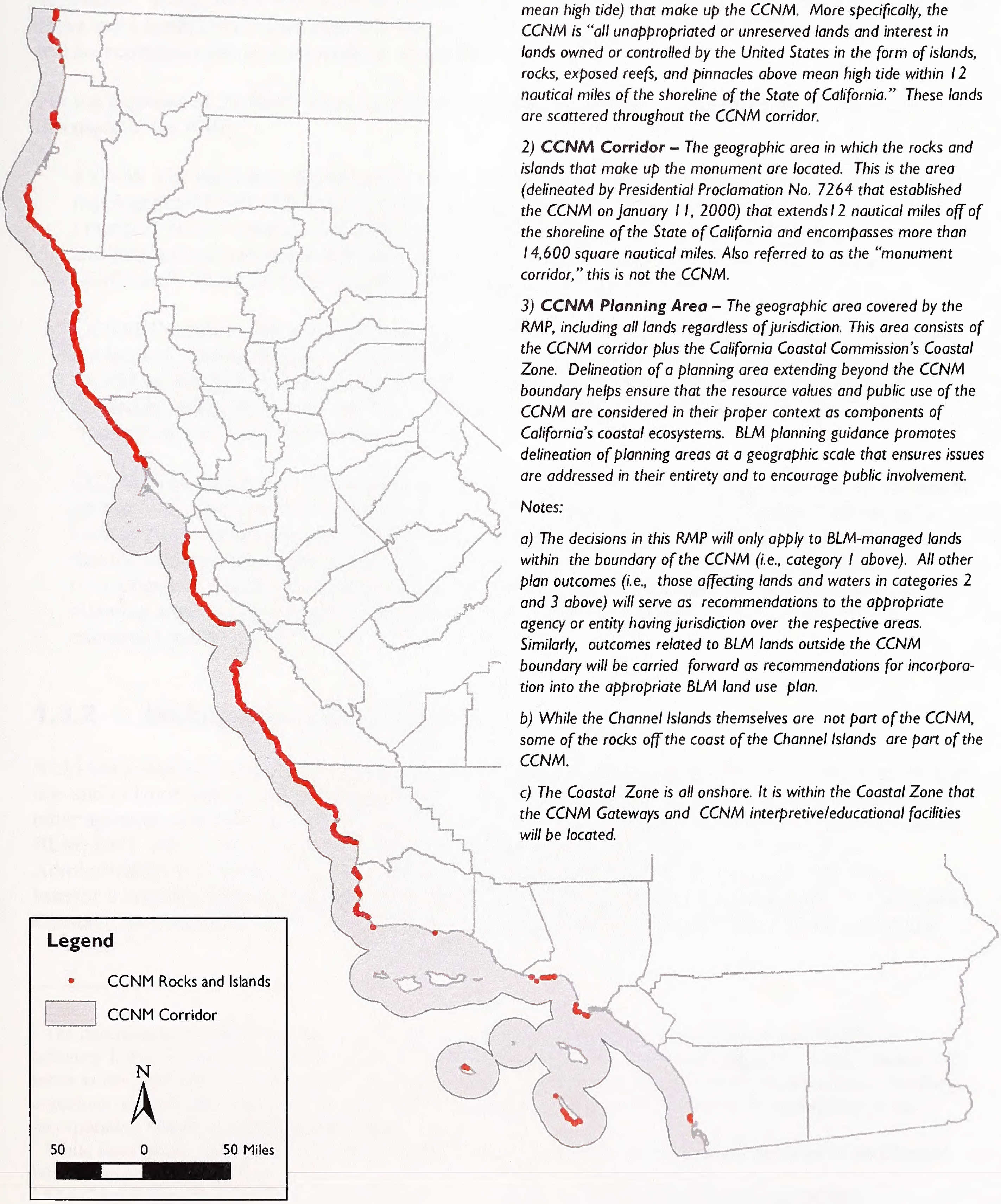

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Figure 1-1b
CCNM Relative Location of Rocks, Islands, and Pinnacles

The CCNM is also of aesthetic and economic value to coastal communities because the rocks and islands provide beautiful scenery for local residents and visitors, as well as a focal point in a vast ocean viewscape. While the CCNM comprises, and its direct management addresses, only those portions of the rocks and islands above mean high tide line, the monument features are a part of a larger coastal and marine ecosystem that both depends on and supports the CCNM.

For the purposes of the RMP, three categories have been developed to describe the lands and waters discussed in the RMP. [7]

> **CCNM**: The more than 20,000 rocks and small islands (i.e., the portion above mean high tide) that make up the CCNM. More specifically, the CCNM is "all unappropriated or unreserved lands and interest in lands owned or controlled by the United States in the form of islands, rocks, exposed reefs, and pinnacles above mean high tide within 12 nautical miles of the shoreline of the State of California." These lands are scattered throughout the CCNM corridor. [8]
>
> **CCNM Corridor**: The geographic area in which the rocks and islands that make up the monument are located. This is the area (delineated by Presidential Proclamation No. 7264 that established the CCNM on January 11, 2000) that extends12 nautical miles off of the shoreline of the State of California and encompasses more than 14,600 square nautical miles. Also referred to as the "monument corridor," this is not the CCNM.
>
> **CCNM Planning Area**: The geographic area covered by the RMP, including all lands regardless of jurisdiction. This area consists of the CCNM corridor plus the California Coastal Commission's Coastal Zone. Delineation of a planning area extending beyond the CCNM boundary helps ensure that the resource values and public use of the CCNM are considered in their proper context as components of California's coastal ecosystems. BLM planning guidance promotes delineation of planning areas at a geographic scale to ensure that issues are addressed in their entirety and to encourage public involvement. [9]

1.3.2 Management Boundaries

BLM has jurisdiction over activities and resources on monument lands only. Activities below mean high tide and in lands and waters surrounding the monument are regulated by core-managing partners and/or other agencies with appropriate jurisdiction. Tables 1-1a and 1-1b clarify the respective jurisdictions of BLM, DFG, DPR, U.S. Fish and Wildlife Service (FWS), National Oceanic and Atmospheric Administration's (NOAA's) National Marine Fisheries Service (NMFS), U.S. Department of the Interior's Minerals Management Service (MMS), California State Lands Commission (SLC), California Coastal Commission, U.S. Coast Guard (USCG), Federal Aviation Administration (FAA), and others through a listing of potential activities on and adjacent to the monument. BLM's role in management of resources that reside in multiple jurisdictions will be clarified through collaboration between agency staff.

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[7] The decisions in this RMP will apply only to BLM-managed lands within the boundary of the CCNM (i.e., category 1 above). All other plan outcomes (i.e., those affecting lands and waters in categories 2 and 3 above) will serve as recommendations to the appropriate agency or entity with jurisdiction over the respective areas. Similarly, outcomes related to BLM lands outside the CCNM boundary will be carried forward as recommendations for incorporation into the appropriate BLM land use plan.

[8] While the Channel Islands themselves are not part of the CCNM, some of the rocks off the coast of the Channel Islands are part of the CCNM.

[9] The Coastal Zone is all onshore. It is within the Coastal Zone that the CCNM Gateways and CCNM interpretive/educational facilities will be located.

Different sites of the CCNM contain varying portions of the intertidal zone, depending on level of exposure and wave action. All management actions addressing vegetation and wildlife resources (see Section 2.2.2) address both the terrestrial and intertidal species contained within the CCNM. BLM will use a tiered adaptive management approach, which includes agency coordination and public involvement, for protecting monument resources.

Existing federal and state regulatory processes in place to address potential activities on and adjacent to the monument are described in Section 1.5.2, "Criteria Established by Other Legislative Constraints."

Management actions proposed in the RMP (Chapter 2) apply to resources on monument lands only, while analysis in the EIS (Chapter 4) assesses the effects of management actions on resources and resource uses found both on and adjacent to monument lands.

Table 1-1a. Agencies with Jurisdiction over Activities on the CCNM

Agency	Camping/Hiking	Wildlife Viewing	Photography/Painting	Recreational Fishing	Abalone/Seaweed Harvesting	Filming	Rock Climbing	Launching /Receiving for Hang Gliding	Hunting	Firearms	Wildlife Protection/Management	Military Activities	Land Development	Mining/Mineral Extraction	Oil Spill Response	Research
U.S. Bureau of Land Management	x	x	x	x	x	x	x	x		x	x	x	x	x	x	x
Core-Managing Partners																
California Department of Fish and Game				x	x				x		x				x	x
California Department of Parks and Recreation																
Federal Agencies																
U.S. Fish and Wildlife Service [a]					x						x				x	x
National Oceanic and Atmospheric Administration's National Marine Fisheries Service [b]											x				x	x
U.S. Department of Homeland Security – Coast Guard											x				x	

[a] Federally protected species under federal Endangered Species Act.

[b] Marine mammals protected under federal Endangered Species Act and Marine Mammal Protection Act.

Table 1-1b. Agencies with Jurisdiction over Activities on Waters, Submerged Lands, or in Air Surrounding the CCNM

Agency	Wildlife Protection/Management	Filming	Swimming/Surfing	Kayaking/Sailing/Windsurfing	Recreational Fishing	Hunting	Firearms	Motor Boating/Jet Skiing	Abalone/Seaweed Harvesting	Motorized Aircraft	Military Activities	Land Development/Ocean Floor	Commercial Fishing	Oil and Gas Leasing	Mining/Mineral Extraction	Oil Spill Response	Research
U.S. Bureau of Land Management																	
Core-Managing Partners																	
California Department of Fish and Game	x				x	x	x		x		x	x	x	x	x	x	x
California Department of Parks and Recreation (within state park boundaries)		x	x	x			x	x			x	x		x	x	x	x
Federal Agencies																	
U.S. Fish and Wildlife Service	x					x	x		x		x	x		x	x	x	x
National Oceanic and Atmospheric Administration's (NOAA's) National Marine Sanctuary Program (within sanctuary boundaries)	x	x						x		x	x	x		x	x	x	x
NOAA's National Marine Fisheries Service	x				x						x	x	x	x	x	x	x
U.S. Department of Homeland Security – Coast Guard	x			x			x	x						x	x	x	
U.S. Department of Defense – Air Force, Navy, Marines, and Army (within DoD boundaries)	x	x	x	x	x	x	x	x	x	x	x	x		x	x	x	x
U.S. Federal Aviation Administration							x			x	x						
State Agencies (within State Waters)																	
California State Lands Commission												x		x	x		
California State Water Resources Control Board								x			x	x		x	x	x	
California Regional Water Quality Control Boards								x			x	x		x	x	x	
California Department of Boating and Waterways				x				x									
Local Agencies																	
Cities and counties (within city or county limits)	x	x	x	x	x	x	x	x	x		x	x	x	x	x	x	x
Harbor commissions (within harbor)			x	x	x	x	x	x	x		x	x	x	x	x	x	x

1.4 Scoping/Issues

The scoping process for the CCNM RMP began on April 24, 2002, when a Notice of Intent (NOI) to prepare an RMP for the CCNM was published in the *Federal Register*. A notice announcing the time and location of the eight initial public scoping meetings was mailed in early August 2002 to more than 450 individuals, organizations, and government agencies. In addition, a news release announcing the time and location of the meetings was sent to approximately 500 media outlets for the 15 California coastal counties. The public scoping period lasted from April 24, 2002, through October 25, 2003.

Public scoping meetings were held in Bodega Bay, Elk, Trinidad, San Diego, Laguna Beach, Santa Barbara, Monterey, and San Francisco, California. In addition to the formal public scoping meetings, several independent meetings were held with interested parties to identify issues of importance. During the public scoping period, BLM received 25 letters that provided input for the RMP and NEPA processes. A full listing of issues raised through the public scoping process is contained in the Scoping Report.

The public was involved again in the planning process through a series of seven meetings on the Draft RMP/Draft EIS. These meetings were held in October and November 2004 in the communities of Moss Landing, Point Arena, Elk, Trinidad, Long Beach, La Jolla, and San Francisco, California. The comments received in these meetings and in 174 letters have been used to modify the draft documents and prepare this Proposed RMP and an accompanying Final EIS. The official responses to the comments are included in the Final EIS.

A web site (http://www.ca.blm.gov/pa/coastal_monument/) was created to provide general information about the CCNM. The site contains a proposed timeline for the completion of the CCNM RMP and other information about the RMP, a copy of the Presidential Proclamation creating the CCNM, a map of the monument, and other relevant information. The Scoping Report is also posted on the web site. The web site will continue to provide information about the CCNM throughout the planning process.

1.4.1 Issues Addressed

Based on the direction provided in the Presidential Proclamation and comments received during the scoping process, BLM and its management partners DFG and DPR identified the following issues to be addressed by the RMP/EIS.

Issues Used to Develop Alternatives

- **How will the plan contribute to the protection of biological resources?** The primary focus of the RMP is the protection of biological resources that rely on the rocks and islands in the CCNM for their various life stages. To fully protect these resources, BLM will develop policies and plan elements to address the need for inventories of the various species that inhabit the CCNM. The potential adverse effects of human activities on and adjacent to the rocks and islands of the CCNM will be considered as protective policies and management actions are developed. BLM will develop policies and plan elements that will address the need for monitoring, public interpretation and education, and coordination of management and research relative to the biological resources of the CCNM.

- **How will the plan contribute to the protection of geologic, cultural, and visual resources?** The proclamation that established the CCNM recognized the relationship between the geologic and cultural significance of California's offshore rocks and islands and the biological resources that inhabit them. The RMP considers the full range of values that are represented in the CCNM as it considers the primary function of biological resource protection. The rocks and islands have unique cultural, geologic, and visual significance to the many residents of the state who visit or live along the California coast. BLM will develop policies and plan elements that address the need for further inventory and ongoing protection of these cultural, geologic, and visual resources. Monitoring, interpretation, education, management and research policies, and plan elements will also be developed with this full range of resource values in mind.
- **How will BLM coordinate its CCNM planning and management activities to be consistent with the numerous jurisdictions that have existing plans and policies associated with the coastal zone?** The RMP defines BLM's role with its major partners (DFG and DPR) in managing the resources of the CCNM. It also identifies ways in which the overlapping planning and management responsibilities of numerous other federal, state, and local jurisdictions will be considered and coordinated in the future. This is the major logistical issue surrounding development and implementation of the RMP. Coordination and linkages will go beyond day-to-day resource management and will extend into the recreational, interpretive, educational, and monitoring aspects of the RMP. Key management policies are or will be developed to deal with private property rights, potential effects on communities along the California coast, and special designations that overlap the CCNM.
- **What programs, facilities, infrastructure, and partnerships are needed to provide the public with interpretive and educational material regarding the values and significance of the CCNM?** Principal resource protection strategies of the RMP include development of public education and interpretation materials and programs, as well as support for ongoing research along the coast. The RMP contains policies and plan elements to address BLM's role in encouraging and providing interpretive materials, educational programs, and research support along the entire California coast. A key role includes coordination of others' efforts, and development of program outlines and templates that can be shared by the many coastal entities that can affect the public's awareness of CCNM values. The RMP identifies the types and levels of infrastructure, facilities, and partnerships that are needed to properly inform the public.

Issues Addressed in the EIS

- **How will people's activities and uses along the coast be affected by management of the CCNM?** The Presidential Proclamation establishing the CCNM gave BLM the authority to protect rocks, small islands, exposed reefs, and pinnacles above mean high tide. The principal protections needed are from human uses of the monument; therefore, all activities that physically disturb these features or that appropriate, injure, destroy, or remove any feature of the monument will not be allowed. Where activities in adjacent waters or lands affect CCNM resources, BLM will consult with the appropriate entities (private property owners, local governments, state regulatory agencies, and other federal agencies) to develop and implement appropriate pratices to protect the monument.

1.4.2 Issues Considered but Not Further Analyzed

Issues beyond the Scope of the Plan

Several of the subjects and issues raised by the public through the scoping process have not been addressed by detailed policies or plan elements in the RMP. These issues and subject areas and the reasons they have not been addressed are described below.

- Regulation of mineral extraction on lands below the mean high tide line,
- Regulation of commercial and recreational sport fishing in coastal waters,
- Imposition of fees for use of adjacent lands,
- Regulation of military activities in coastal and nearshore areas, and
- Use of sonar in the coastal area.

The CCNM RMP does not propose regulation of mineral extraction, commercial and recreational fishing, military activities, or use of sonar in the coastal waters adjacent to the CCNM because these activities are not within the CCNM and are regulated by other state and federal agencies. The potential indirect effects of these activities on monument resources are considered in the RMP and EIS as part of the existing setting in which the RMP will be implemented.

Issues Addressed through Administrative or Policy Action

The RMP includes administrative and policy actions, which provide the overarching approach to managing the CCNM. These actions are described in Chapter 2 under "Overall Management Approach." This general management guidance represents the basic operating procedures for the monument, which would be implemented to help fulfill the goal of the proclamation, regardless of the specific management actions selected.

1.5 Planning Criteria and Legislative Constraints

1.5.1 Criteria Developed Internally

BLM planning regulations have been used to develop this RMP. In addition to the planning requirements of FLPMA, BLM planning regulations (43 Code of Federal Regulations [CFR] 1610) require that planning criteria be identified to guide the development of all management plans. Planning criteria ensure that plans address pertinent issues, and that unnecessary data collection and analysis are avoided. Planning criteria are based on applicable laws; agency guidance; public comments; and coordination with other federal, state, and local governments and Native American tribes. The following planning criteria were used in developing the CCNM RMP:

- The RMP will establish guidance upon which BLM will rely in managing the CCNM, in cooperation with DFG; DPR; and other federal, tribal, state, and local agencies with land management responsibilities along California's coastline.

- The RMP planning and environmental review processes will be completed cooperatively with BLM partners, including DFG; DPR; and other federal, tribal, state, and local agencies and organizations.
- The RMP will be completed in compliance with FLPMA, NEPA, and all other applicable laws.
- The RMP will conform to the direction included in the Presidential Proclamation of January 11, 2000, which established the CCNM. Specifically, the RMP will give priority to the protection of: (a) geologic features in the CCNM; (b) biological resources supported in the CCNM, including seabirds and pinnipeds; and (c) other natural and cultural resources and resource values, including scientific and aesthetic values, within the monument.
- The RMP will conform to the directive of January 11, 2000, from the Secretary of the Interior that accompanied the Presidential Proclamation, entitled Management of the California Coastal National Monument, and/or any subsequent direction from the Secretary. Specifically, the RMP will respect valid existing rights to the use of or access to the CCNM and surrounding lands and coastal waters.
- The RMP will not regulate or manage resources that are within the existing jurisdiction and regulatory responsibility of other agencies (e.g., fisheries, minerals on the outer continental shelf, and public coastal access).
- The RMP will not consider in detail activities that may indirectly affect the CCNM, including oil drilling, shipping, water-based recreation, and fishing. The RMP may contain action plans, however, for those activities that may result in a significant indirect effect on CCNM resources.
- Economic viability will not be considered in detail in the RMP; economic issues may be discussed and analyzed qualitatively based on activities in the vicinity of the CCNM.
- The lifestyles and concerns of coastal area residents will be recognized in the RMP.
- The planning process will protect Native American traditional uses and cultural resources.
- To the extent feasible without compromising resource protection, the RMP will be consistent with existing management plans, regulations, and laws governing adjacent lands and resources under the jurisdiction of other federal, tribal, state, and local governments.
- The planning period addressed in the RMP will be 20 years.
- RMP decisions will use the best available science and an adaptive management approach.
- The RMP will identify opportunities for education and interpretation regarding coastal values, especially where those opportunities can be shared with BLM partner entities.
- Nothing in the RMP expressly or implicitly precludes, restricts, or requires modification of current or future uses of the lands, waters, or airspace adjacent to the CCNM by the USCG or the Department of Defense (DoD), or their agents, allies, military range and test facilty users, or range service providers.

1.5.2 Criteria Established by Other Legislative Constraints

A broad range of federal and state laws guide development of the RMP. Table 1-2 lists federal and state laws that apply to the monument and its planning process. The responsible governing agency, the trigger that causes the law to apply, the process that is required by the law, and the action required during the RMP preparation process are also included in the table for each law. Key laws with bearing on the

Table 1-2. Applicable Federal and State Laws

Item	Responsible Governing Agency	Trigger	Process	Action Required during RMP Preparation/Approval
Federal Level				
National Environmental Policy Act (NEPA)	U.S. Bureau of Land Management (BLM)	Federal action (not a categorical exclusion)	Prepare an environmental impact statement (EIS)	Compliance efforts are currently in progress.
Federal Land Policy and Management Act (FLPMA)	BLM	Federal action	Provide a statement in the Resources Management Plan (RMP); abide by the provisions of the FLPMA	Compliance efforts are currently in progress.
Multiple Use Sustained Yield Act of 1960	BLM	Federal action	Manage lands for multiple-use principles	Compliance efforts are currently in progress.
Coastal Zone Management Act	Coastal Programs Division (CPD) within National Oceanic and Atmospheric Administration's (NOAA's) Office of Ocean and Coastal Resource Management (OCRM); California Coastal Commission; California Coastal Conservancy	Federal action	Reflect in the RMP under "Planning Criteria"	Assess impacts of management actions needed to implement the plan. decisions. Prepare and submit to the Coastal Commission a consistency determination that evaluates the RMP for consistency with the California Coastal Management Program.
Clean Water Act (General Provisions)	U.S. Environmental Protection Agency (EPA); U.S. Army Corps of Engineers (Corps); and Regional Water Quality Control Board (RWQCB)	Federal action	Reflect in the RMP under "Planning Criteria"	Assess impacts of management actions needed to implement the plan decisions.
Clean Air Act	EPA; Air Quality Management District (AQMD); Air Pollution Control District (APCD)	Federal action	Reflect in the RMP under "Planning Criteria"	Assess impacts of management actions needed to implement the plan decisions.

Table 1-2. Applicable Federal and State Laws (continued)

Page 2 of 4

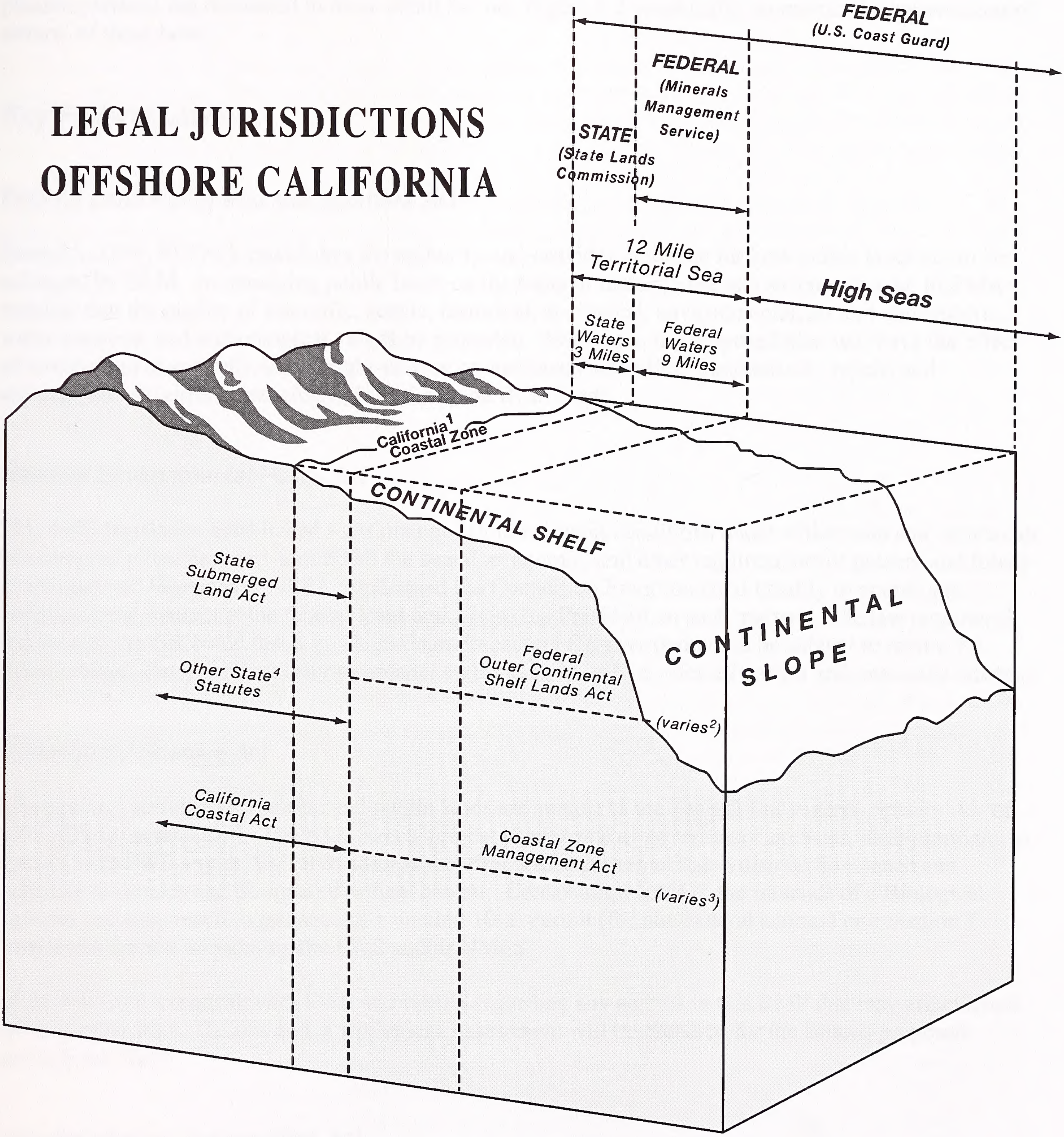
Item	Responsible Governing Agency	Trigger	Process	Action Required during RMP Preparation/Approval
Federal Level (continued)				
Endangered Species Act	U.S. Fish and Wildlife Service (FWS); National Oceanic and Atmospheric Administration National Marine Fisheries Service (NMFS)	Federal action	Reflect in the RMP under "Planning Criteria"; conduct Section 7 consultation	(1) Assess impacts of management actions needed to implement the plan decisions. (2) Prepare a Biological Assessment (BA).
Marine Mammal Protection Act (MMPA)	FWS; NMFS	Federal action	Reflect in the RMP under "Planning Criteria"	Ensure consistency with MMPA.
Magnuson-Stevens Fishery Conservation and Management Act	FWS; NMFS	Federal action	Reflect in the RMP under "Planning Criteria"	Ensure consistency with Magnuson-Stevens Fishery Conservation and Management Act.
Migratory Bird Treaty Act	FWS	Federal action	Reflect in the RMP under "Planning Criteria"	Assess impacts of management actions needed to implement the plan decisions.
Federally signed treaties	Bureau of Indian Affairs; Federally Recognized Tribes (e.g., Yurok Tribe and Trinidad Ranchería)	Federal action	Reflect in the RMP under "Planning Criteria"	Treat tribes as consulting parties.
Indian Trust Asset and Trust Fund Management and Reform Act of 2002	U.S. Department of the Interior (DOI)	Federal action	Reflect in the RMP under "Planning Criteria"	(1) Treat tribes as consulting parties. (2) Conduct coordination with the Trust Fund and Trust Asset Management and Monitoring Plan for each tribe.
National Marine Sanctuaries Act	National Marine Sanctuary Program (within NOAA's National Ocean Service)	Federal action	Reflect in the RMP under "Planning Criteria"	Ensure consistency with National Marine Sanctuaries Act.

Table 1-2. Applicable Federal and State Laws (continued)

Item	Responsible Governing Agency	Trigger	Process	Action Required during RMP Preparation/Approval
Federal Level (continued)				
National Historic Preservation Act (NHPA)	State Historic Preservation Office	Federal action	Reflect in the RMP under "Planning Criteria"; follow the National Programmatic Agreement	Comply with Section 106 and Section 110 processes as triggered by NEPA.
Rivers and Harbors Act	U.S. Department of Defense (DoD) (U.S. Coast Guard [USCG] and Corps); U.S. Department of Homeland Security; FWS	Federal action	Reflect in the RMP under "Planning Criteria"	(1) Control ingress/egress in the coastal zone. (2) Assess impacts of management actions and land use allocations needed to implement plan decisions.
State Level				
California Environmental Quality Act (CEQA)	California Department of Fish and Game (DFG), California Department of Parks and Recreation (DPR)	State project	Prepare environmental impact report (EIR)	No action is anticipated at this time, as no state discretionary action is proposed.
California Endangered Species Act (CESA)	DFG	Take	Reflect in the RMP under "Planning Criteria"	(1) Assess impacts of management actions and land use allocations needed to implement the plan decisions. (2) Ensure compliance with Section 2081 of the California Fish and Game Code; if same species as the federal Endangered Species Act, prepare a concurrence letter.

Table 1-2. Applicable Federal and State Laws (continued)

Item	Responsible Governing Agency	Trigger	Process	Action Required during RMP Preparation/Approval
State Level (continued)				
California Coastal Act	Resources Agency, California Coastal Commission	Project in coastal zone	Reflect in the RMP under “Planning Criteria”	Prepare and submit to the Coastal Commission a consistency determination that evaluates the RMP for consistency with the California Coastal Management Program.
Marine Life Protection Act	DFG	State project	Reflect in the RMP under “Planning Criteria”	Conduct coordination only.
Marine Management Improvement Act	Resources Agency (DPR, DFG, and State Water Resources Control Board)	State project	Reflect in the RMP under “Planning Criteria”	Conduct coordination only.


LEGAL JURISDICTIONS OFFSHORE CALIFORNIA
FEDERAL (U.S. Coast Guard)
FEDERAL (Minerals Management Service)
STATE (State Lands Commission)
12 Mile Territorial Sea
High Seas
State Waters 3 Miles
Federal Waters 9 Miles
California¹ Coastal Zone
CONTINENTAL SHELF
CONTINENTAL SLOPE
State Submerged Land Act
Other State⁴ Statutes
Federal Outer Continental Shelf Lands Act
(varies²)
California Coastal Act
Coastal Zone Management Act
(varies³)

[1] The Legislature adopted maps defining the inland boundary of the coastal zone.

[2] The seaward reach of the continental shelf cannot be precisely delineated.

[3] The landward and seaward reach of the Coastal Zone Management Act cannot be precisely delineated

[4] Under certain very limited circumstances, the State can enforce some of its laws beyond 3 miles from shore.

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Figure 1-2
Legal Jurisdictions Offshore of the California Coast

planning criteria are discussed in more detail below. Figure 1-2 graphically represents the jurisdictions of several of these laws.

Key Federal Laws

Federal Land Policy and Management Act

Passed in 1976, FLPMA establishes the authority and provides guidance for how public lands are to be managed by BLM. In managing public lands on the basis of multiple use and sustained yield, FLPMA requires that the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values be protected. Nothing in the proposed plan will have the effect of terminating any validly issued right-of-way or customary operation, maintenance, repair, and replacement activities in existing rights-of-way on BLM lands.

National Environmental Policy Act

This 1970 legislation established a national policy to maintain conditions under which man and nature can exist in productive harmony and fulfill the social, economic, and other requirements of present and future generations of Americans. NEPA established the Council on Environmental Quality to coordinate environmental matters at the federal level and advise the President on such matters. The law requires all federal actions that could result in a significant impact on the environment to be subject to review by federal, tribal, state, and local environmental authorities, as well as affected parties and interested citizens.

Endangered Species Act

Management activities on private and public lands are subject to the Federal Endangered Species Act of 1973 (ESA), as amended. The ESA directs project proponents or government agencies, as appropriate, to consult with FWS and/or NMFS to address the effects of management activities on threatened and endangered species and designated critical habitat. Consultation leads to the issuance of a Biological Opinion and may result in issuance of a Section 10(a) permit (for non-federal actions) or a Section 7 permit (for federal actions) by the FWS and/or NMFS.

BLM will need to consult with FWS and NMFS regarding any actions in this RMP that may affect listed species under ESA. To this end, a Biological Assessment will be prepared for the actions proposed through this RMP.

National Historic Preservation Act

The National Historic Preservation Act (NHPA) is the primary federal law providing for the protection and preservation of historic and archaeological properties, and includes those of national, state, and local significance. The law directs federal agencies to consider the effects of proposed actions on properties eligible for or included on the National Register of Historic Places (NRHP). NHPA established the NRHP, the Advisory Council on Historic Preservation (ACHP), and the State Historic Preservation Officers (SHPOs).

Marine Mammal Protection Act

The Marine Mammal Protection Act (MMPA) was passed by Congress to protect the many mammals that live in the world's oceans. This legislation is the basis for policies preventing the harassment, capture, injury, or killing of all species of whales, dolphins, seals, and sea lions—as well as walruses, manatees, dugongs, sea otters, and polar bears.

The law, among other things, sets up a management regime to reduce marine mammal mortalities and injuries in their interactions with fisheries (such as gear entanglement), regulates scientific research in the wild, establishes basic requirements for public display of captive marine mammals, and regulates the import and export of marine mammals and their products.

The primary government agency responsible for enforcing the MMPA is NMFS. Under the MMPA, NMFS is responsible for the management and conservation of whales and dolphins (cetaceans) and pinnipeds other than the walrus. Walruses, manatees, and dugongs (sirenians), sea otters, and polar bears are under the jurisdiction of the FWS.

The CCNM provides habitat for a variety of seals and sea lions, as well as the sea otter—all species protected under the MMPA.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) is the domestic law that implements the commitment of the United States to four international conventions (with Canada, Japan, Mexico, and Russia, respectively) for the protection of a shared migratory bird resource. The MBTA decreed that all migratory birds and their parts (including eggs, nests, and feathers) were fully protected. Each of the conventions protects selected species of birds that are common to both countries in the convention in question (i.e., they occur in both countries at some point during their annual life cycle). The MBTA is implemented by the FWS. BLM will be required to manage the bird populations of the CCNM consistent with the requirements of the MTBA.

Coastal Zone Management Act

In 1972, Congress enacted the Coastal Zone Management Act (CZMA) (16 USC. 1451 et seq.), providing a crucial link between coastal states and federal activities. The CZMA encourages management of coastal zone areas and provides grants to be used in maintaining coastal zone areas. As an incentive for states to develop management plans for their coastal resources, Congress granted states the ability to review federal agency activities that affect the coastal zone and, in some circumstances, to stop or modify federally permitted activities that are not consistent with the state coastal program. The Act is intended to ensure that federal activities are consistent with state programs for the protection and, where possible, enhancement of the nation's coastal zones. The CZMA applies to actions initiated, permitted, or funded by federal agencies within the coastal zone. As defined in the Act, the coastal zone includes coastal waters extending to the outer limit of state submerged land title and ownership, adjacent shorelines, and land extending inward to the extent necessary to control shorelines. The coastal zone includes islands, beaches, transitional and intertidal areas, and salt marshes. While the coastal zone by definition does not include federal land, the CZMA nonetheless applies to most federal activities or federally permitted activities that are located adjacent to or near the coastal zone, because such activities often affect the coastal zone and the resources therein—both onshore and offshore.

The Secretary of Commerce can override a state's objection to an applicant's certification if the Secretary of Commerce finds that the federal license or permit activity is consistent with the objectives of the CZMA or is otherwise necessary in the interest of national security. In addition, in the event of a serious disagreement between a federal agency and a state agency regarding the consistency of a proposed federal activity affecting any coastal use or resource, either party may request mediation by the Office of Ocean and Coastal Resource Management in NOAA.

BLM will submit a consistency determination for the proposed RMP to the California Coastal Commission as part of compliance with the CZMA.

Key State Laws

California Environmental Quality Act

Passed in 1970, the goal of the California Environmental Quality Act (CEQA) (California Public Resources Code §21000 et seq.) is to develop and maintain a high-quality environment for this and future generations. CEQA requires California's public agencies to identify the significant environmental effects of their actions and to avoid or mitigate those significant environmental effects, where feasible. Through preparation of an Environmental Impact Report (EIR), state and local agencies and the general public are provided with information on the potentially significant environmental effects that a proposed project is likely to have, ways that the significant environmental effects may be minimized, and alternatives to the proposed project.

Although no action is anticipated at this time, all development activity along the California coast is subject to CEQA, including potential future development of recreational and educational/interpretive facilities by BLM or core-managing partners.

California Endangered Species Act

The California Endangered Species Act (CESA) (California Fish and Game Code §2050 et seq.) generally parallels the main provisions of the federal ESA and is administered by DFG. Under CESA, the term "endangered species" is defined as a species of plant, fish, or wildlife that is "in serious danger of becoming extinct throughout all, or a significant portion of its range" and is limited to species or subspecies native to California. CESA establishes a petitioning process for listing threatened or endangered species. State lead agencies are required to consult with DFG to ensure that a proposed action is not likely to jeopardize the continued existence of any endangered or threatened species or result in destruction or adverse modification of essential habitat.

BLM will work closely with DFG to assess the potential impacts of CCNM management actions and land use allocations on threatened or endangered species, and will ensure compliance with Section 2081 of the Fish and Game Code.

California Coastal Act

The California Coastal Act (California Public Resources Code §30000 et seq.) was enacted by the State Legislature in 1976 to provide long-term protection of California's 1,100-mile coastline for the benefit of current and future generations. The Coastal Act created a unique partnership between the State (acting through the California Coastal Commission) and local government (15 coastal counties and 58 cities) to manage the conservation and development of coastal resources through a comprehensive planning and regulatory program. The Coastal Act made permanent the coastal protection program launched on a temporary basis by a citizens' initiative that California voters approved in November 1972 (Proposition 20—the "Coastal Conservation Initiative").

BLM will submit a consistency determination for the proposed RMP to the California Coastal Commission as part of compliance with the Coastal Act.

Marine Life Protection Act

This 1999 legislation requires that DFG develop a plan for establishing networks of marine protected areas (MPAs) in California waters to protect habitats and preserve ecosystem integrity. The Marine Life Protection Act (MLPA) (California Fish and Game Code §2850 et seq.) states that "marine life reserves" (defined as no-take areas) are essential elements of an MPA system because they "protect habitat and ecosystems, conserve biological diversity, provide a sanctuary for fish and other sea life, enhance recreational and educational opportunities, provide a reference point against which scientists can measure changes elsewhere in the marine environment, and may help rebuild depleted fisheries." The MLPA Master Plan includes recommendations for a preferred alternative network of MPAs that take full advantage of the multiple benefits that can be derived from the establishment of marine life reserves.

BLM will coordinate with DFG to ensure that monument lands within MPAs are managed appropriately.

1.6 Planning Process

1.6.1 Relationship to BLM Policies, Plans, and Programs

This RMP will be prepared to be consistent with BLM policies and existing BLM plans and programs. Relevant policies include:

- CFR Title 43 (1610) (BLM's planning guidance and regulations) and BLM Manual 1601; and
- Native American consultation per Executive Orders 12866, 13084, et al.

Five BLM field offices have jurisdiction over portions of the California coast (see Figure 1-3). Each of these field offices has a plan that guides policies and land use. Lands under BLM jurisdiction that adjoin the coast are currently divided into nine areas for management; each of these areas is under an RMP or other land-use plan. Table 1-3 lists BLM on-shore coastal units and projects, and the status of their respective plans. This RMP will amend these other BLM plans where inconsistencies exist between the RMP and those plans.

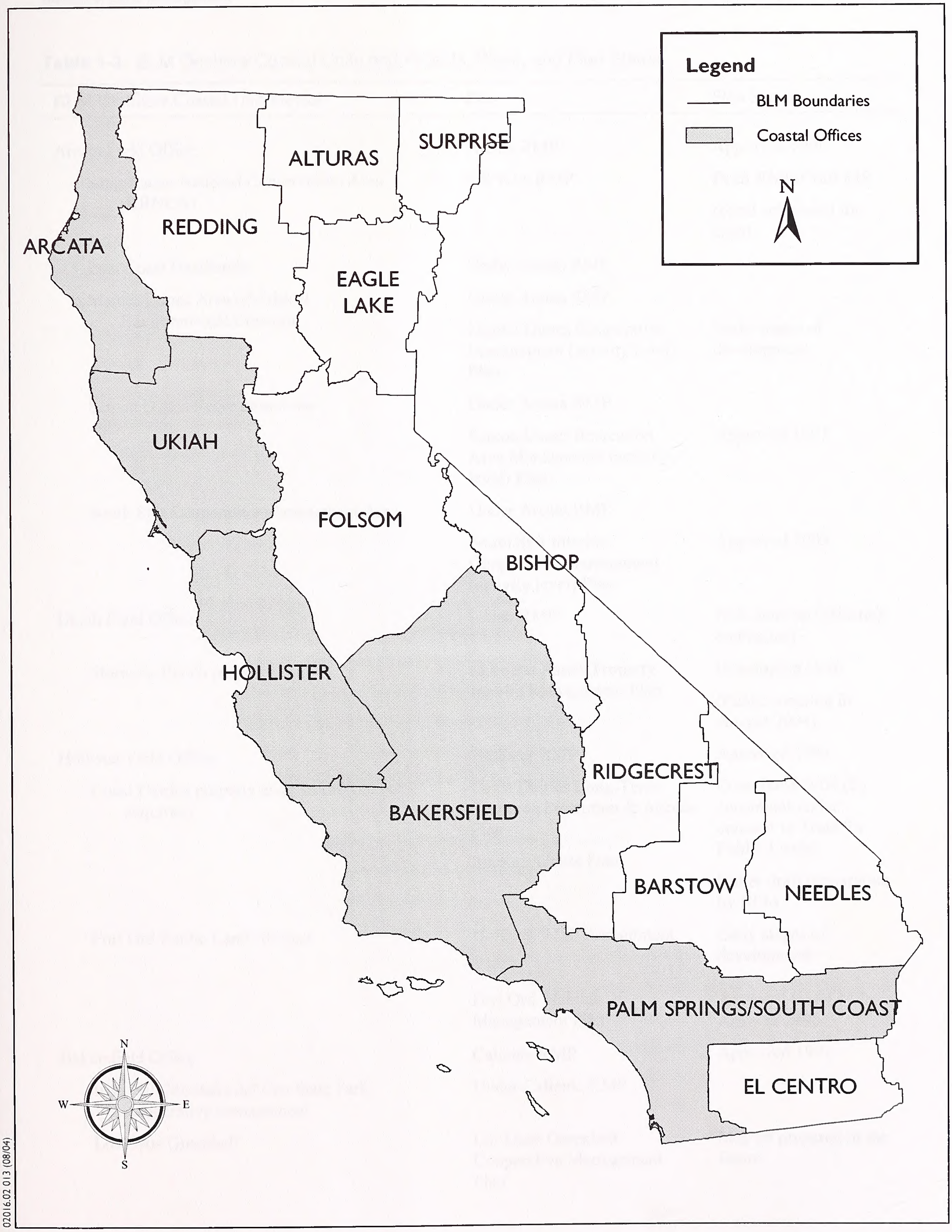

Legend
BLM Boundaries
Coastal Offices
N
SURPRISE
ALTURAS
REDDING
ARCATA
EAGLE LAKE
UKIAH
FOLSOM
BISHOP
HOLLISTER
RIDGECREST
BAKERSFIELD
BARSTOW
NEEDLES
PALM SPRINGS/SOUTH COAST
EL CENTRO
N
W
E
S
02016.02 013 (08/04)

Figure 1-3
BLM Field Office Boundaries

Table 1-3. BLM Onshore Coastal Units and Projects, Plans, and Plan Status

BLM On-Shore Coastal Unit/Project	Plan	Plan Status
Arcata Field Office	Arcata RMP	Approved 1996
King Range National Conservation Area (KRNCA)	KRNCA RMP	Draft RMP/Draft EIS (Final scheduled for 2/05)
Lost Coast Headlands	Under Arcata RMP	
Manila Dunes Area of Critical Environmental Concern	Under Arcata RMP	
	Manila Dunes Cooperative Management (activity level) Plan	Early stages of development
Samoa Dunes Recreation Area	Under Arcata RMP	
	Samoa Dunes Recreation Area Management (activity level) Plan	Approved 1997
South Spit Cooperative Management Area	Under Arcata RMP	
	South Spit Interim Cooperative Management (activity level) Plan	Approved 2003
Ukiah Field Office	Ukiah RMP	New start-up (selecting contractor)
Stornetta Ranch property	Stronetta Ranch Property Interim Management Plan	Developing Draft (Public meeting in August 2004)
Hollister Field Office	Hollister RMP	Approved 1984
Coast Dairies property acquisition (not yet acquired)	Coast Dairies Long-Term Resource Protection & Access Plan	Completed 2004 (by consultant under contract to Trust for Public Lands)
	Interim Access Plan	Under draft preparation by BLM
Fort Ord Public Lands Project	Hollister RMP Amendment	Early stages of development
	Fort Ord Habitat Management Plan	Accepted by BLM from Army in 1996
Bakersfield Office	Caliente RMP	Approved 1997
Irish Hill/Montaña del Oro State Park cooperative management	Under Caliente RMP	
Los Osos Greenbelt	Los Osos Greenbelt Cooperative Management Plan	May be prepared in the future

Table 1-3. BLM Onshore Coastal Units and Projects, Plans, and Plan Status (continued)

BLM On-Shore Coastal Unit/Project	Plan	Plan Status
Piedras Blancas Light Station	Piedras Blancas Light Station Management (activity level) Plan	Early stages of development (planned for completion by end of FY05)
Point Sal Area of Critical Environmental Concern	Under Caliente RMP	
Palm Springs/South Coast Field Office	South Coast RMP	Approved 1994
San Diego Project	Under South Coast RMP	

1.6.2 Cooperating Agencies

The following agencies have signed memoranda of understanding (MOUs) with BLM, agreeing to serve as a "cooperating agency" under the President's Council of Environmental Quality regulations (40 CFR 1500–1508) implementing NEPA:

- DFG,
- DPR, and
- Cher-Ae Heights Indian Community of the Trinidad Rancheria (a federally recognized tribe).

An MOU with Vandenberg Air Force Base (AFB) is currently going through the U.S. Air Force approval process, and approval is expected in the near future.

1.6.3 Collaboration

In addition to the officially recognized cooperating agencies under NEPA, the following agencies and entities have participated as "Agency and Organization Contacts" in the planning process:

- California Coastal Conservancy;
- California Coastal Commission;
- SLC;
- California Department of Boating and Waterways;
- City of Laguna Beach;
- City of San Diego;
- Coastal America;
- The Nature Conservancy;
- Partnership for Interdisciplinary Studies of Coastal Oceans (PISCO), UC Santa Cruz;
- Pt. Reyes Bird Observatory (PRBO) Conservation Science;
- San Luis Obispo County;
- San Mateo County;
- U.S. Department of Commerce;
- Channel Islands National Marine Sanctuary, NOAA;
- Monterey Bay National Marine Sanctuary (MBNMS), NOAA;
- NMFS, NOAA;
- National Marine Protected Areas Center, NOAA;
- National Ocean Service, NOAA;
- Office of Coast Survey, NOAA;
- DoD;
- U.S. Air Force;
- U.S. Navy;
- USCG;
- U.S. Department of the Interior (DOI);
- National Park Service (NPS);
- FWS; and
- MMS.

The following agencies, among others, will be consulted during the planning process due to legislative mandates contained in specific federal and state environmental laws (the laws are identified in parentheses below):

- FWS (for ESA, MBTA, MMPA, and Magnuson-Stevens Act),
- NMFS (for ESA and MMPA),
- California Coastal Commission (for CZMA and California Coastal Act),
- Office of the California State Historic Preservation Officer (for NHPA),
- DPR (for CEQA), and
- DFG (for CEQA, CESA, and MLPA).

For more information regarding partnerships and collaboration with other agencies and entities, see Chapter 5, "Consultation and Coordination."

1.7 Related Plans

Fifteen counties; numerous municipalities; and dozens of park units, tribal lands, and other agency holdings are located along the coast of California, within California state waters, within adjacent federal waters, and on offshore land masses. Each of these jurisdictions is governed by a land use or other management plan (e.g., city and county general plans, and parks management plans). Figures 1-4a–e shows locations of many of the coastal entities and managed areas.

It is important to note that coastal planning is an ongoing process, with many plans being modified each year. The current state planning process for MPAs is especially important, as it will affect management of resources in the waters surrounding the CCNM. Each state marine managed area is in the process of being reclassified into one of six new classifications, as required under state legislation called the Marine Managed Areas Improvement Act. The six new classifications are state marine reserve, state marine park, state marine conservation area, state marine cultural preservation area, state marine recreational management area, and state water quality protection area.

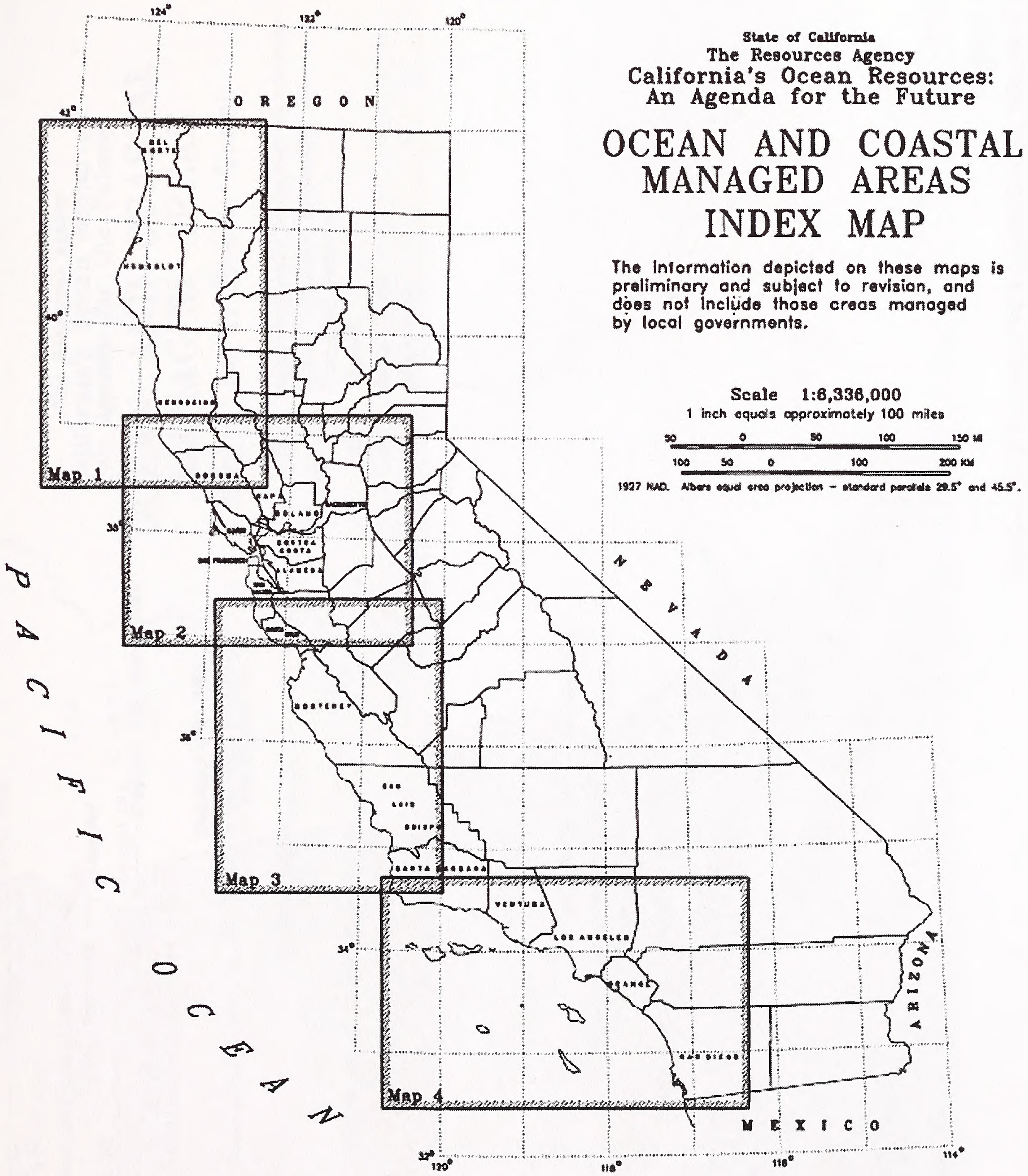
1.8 Existing Designations

1.8.1 Area of Critical Environmental Concern

In 1990, the California Islands Wildlife Sanctuary was designated by BLM as an Area of Critical Environmental Concern (ACEC). This designation highlighted the special values of the rocks and islands, and provided additional protection of the resources found on them. Daily management of the sanctuary continued to be the responsibility of the DFG as prescribed in the Memorandum of Understanding of 1983.

1.8.2 California Offshore Rocks and Pinnacles Ecological Reserve

On August 27, 1988, the California Fish and Game Commission designated all areas within 0.5 mile of the California coastline as an Ecological Reserve under the authority of the California Code of Regulations, Title 14, Sections 630 (Ecological Reserves) and 632 (Marine Protected Areas). As such,


124°
122°
120°
42°
40°
38°
36°
34°
32°
120°
118°
116°
114°
O R E G O N
N E V A D A
A R I Z O N A
M E X I C O
P A C I F I C O C E A N
DEL NORTE
HUMBOLDT
MENDOCINO
SONOMA
NAPA
SOLANO
SACRAMENTO
MARIN
CONTRA COSTA
SAN FRANCISCO
ALAMEDA
MONTEREY
SAN LUIS OBISPO
SANTA BARBARA
VENTURA
LOS ANGELES
ORANGE
SAN DIEGO
Map 1
Map 2
Map 3
Map 4
Scale 1:6,336,000
1 inch equals approximately 100 miles
50 0 50 100 150 MI
100 50 0 100 200 KM
1927 NAD. Albers equal area projection – standard parallels 29.5° and 45.5°.

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OCEAN AND COASTAL MANAGED AREAS INDEX MAP

The information depicted on these maps is preliminary and subject to revision, and does not include those areas managed by local governments.

Designations not shown on the set of maps include:

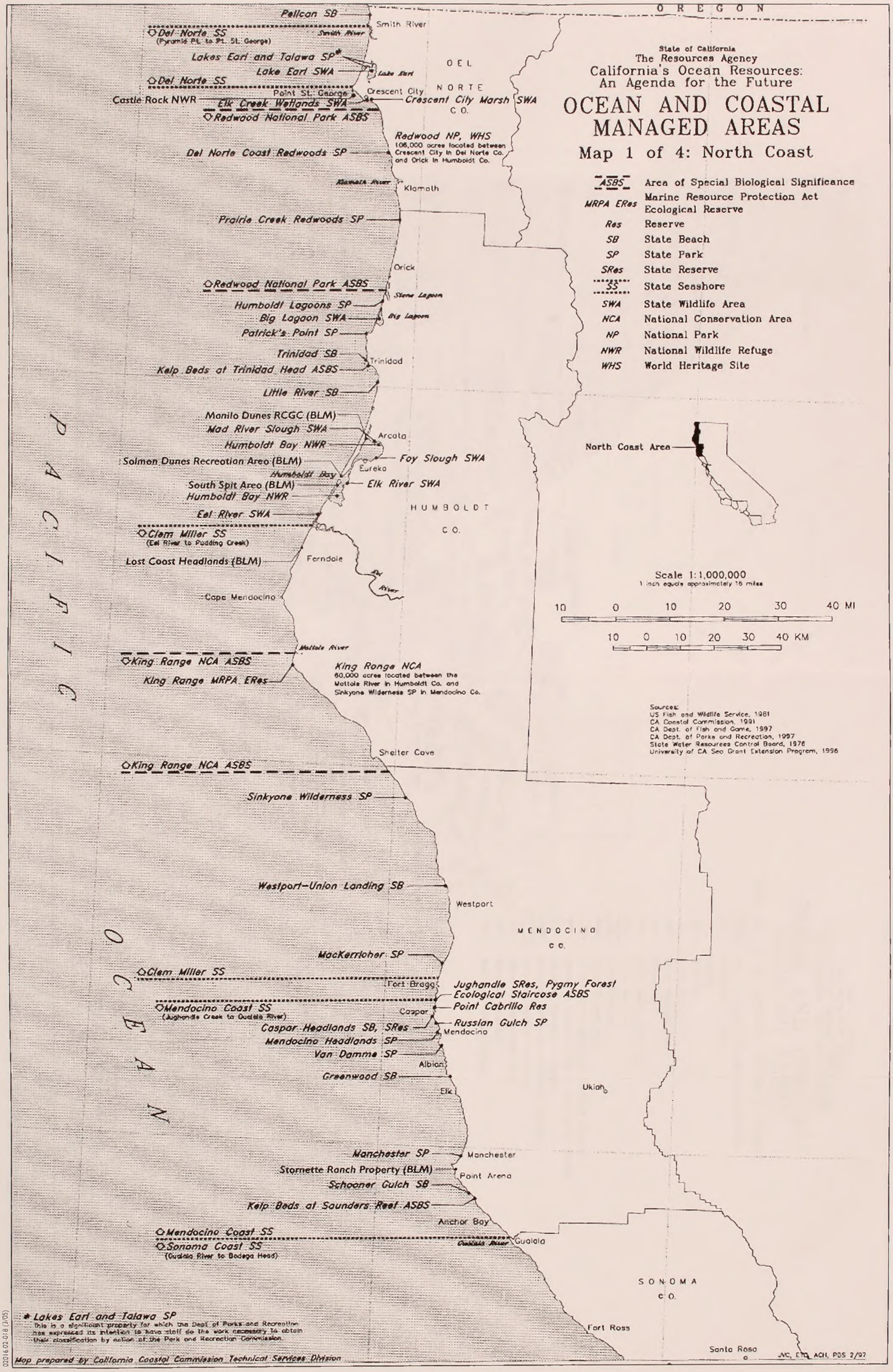
CALIFORNIA COASTAL SANCTUARY
Established by AB 2444 (1994), which permanently bans future leasing for the extractment of oil and gas in state waters. State waters extend from the mean high tide line to the three nautical mile limit and include all offshore rocks and islands as well as San Francisco and Monterey Bays.

OFFSHORE ROCKS AND PINNACLES ECOLOGICAL RESERVE
Granted to the Fish and Game Commission through Fish and Game Code, Division 2, Article 4, Sections 1580, 1581, 1583, and 1907.

CALIFORNIA ISLANDS WILDLIFE SANCTUARY
Established by 43 CFR Public Land Order 6369, which withdraws all unreserved islands, rocks, and pinnacles off California from settlement, location, sale or entry.

UNESCO'S MAN AND THE BIOSPHERE RESERVES
Established by UNESCO's Man and the Biosphere Programme (MAB) to protect natural diversity for research and education. Three shoreline sites in California: CA Coast Ranges, Central CA Coast, and Channel Islands.

Figure I-4a
Ocean and Coastal Managed Areas, Index Map


State of California
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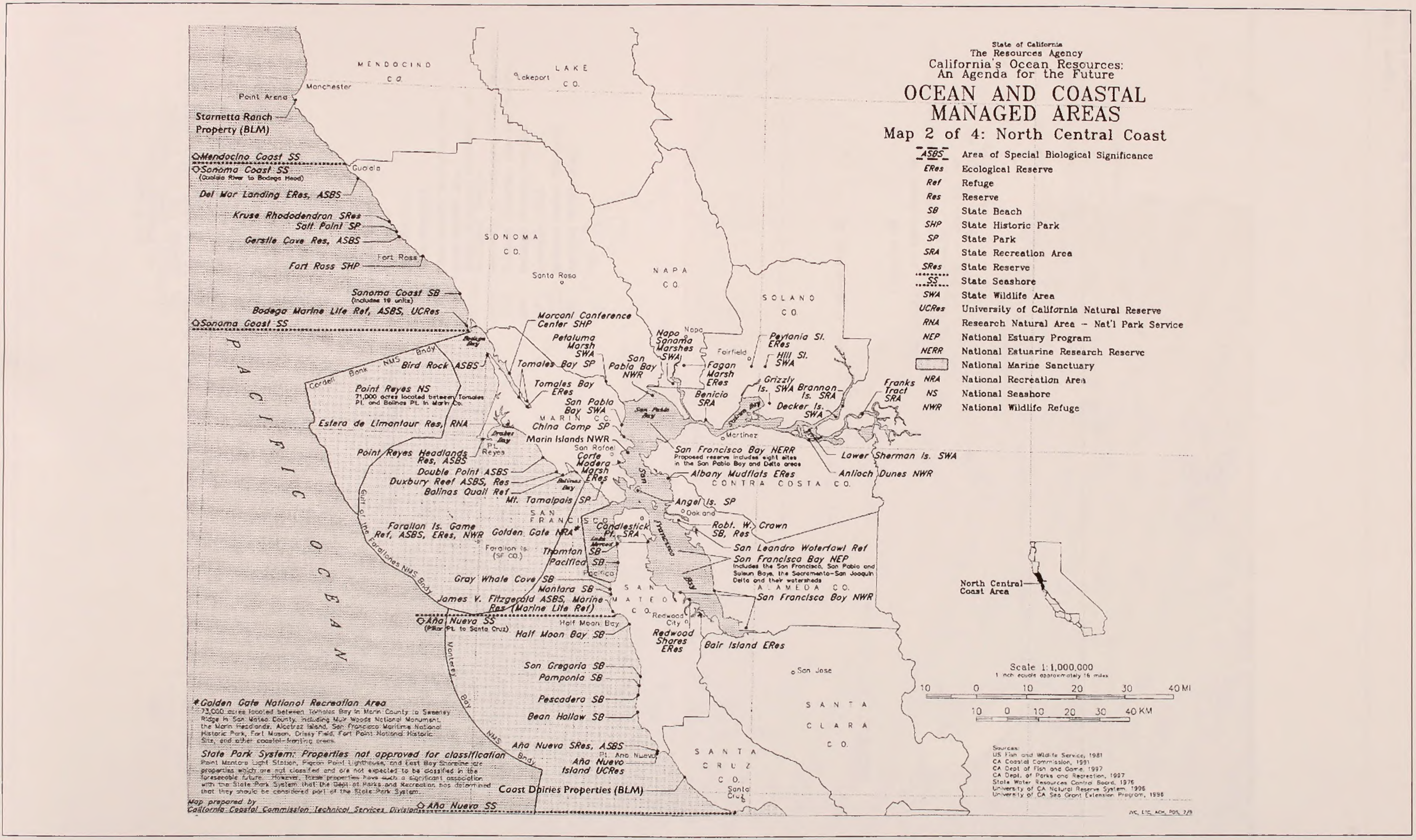
OCEAN AND COASTAL MANAGED AREAS
Map 1 of 4: North Coast
ASBS Area of Special Biological Significance
MRPA ERes Marine Resource Protection Act Ecological Reserve
Res Reserve
SB State Beach
SP State Park
SRes State Reserve
SS State Seashore
SWA State Wildlife Area
NCA National Conservation Area
NP National Park
NWR National Wildlife Refuge
WHS World Heritage Site
North Coast Area
Scale 1:1,000,000
1 inch equals approximately 16 miles
10 0 10 20 30 40 MI
10 0 10 20 30 40 KM
Sources:
US Fish and Wildlife Service, 1981
CA Coastal Commission, 1991
CA Dept. of Fish and Game, 1997
CA Dept. of Parks and Recreation, 1997
State Water Resources Control Board, 1976
University of CA Sea Grant Extension Program, 1996
OREGON
DEL NORTE CO.
HUMBOLDT CO.
MENDOCINO CO.
SONOMA CO.
PACIFIC OCEAN
Pelican SB
Smith River
Smith River
Del Norte SS
(Pyramid Pt. to Pt. St. George)
Lakes Earl and Talawa SP*
Lake Earl SWA
Lake Earl
Del Norte SS
Point St. George
Crescent City
Crescent City Marsh SWA
Castle Rock NWR
Elk Creek Wetlands SWA
Redwood National Park ASBS
Redwood NP, WHS
106,000 acres located between Crescent City in Del Norte Co. and Orick in Humboldt Co.
Del Norte Coast Redwoods SP
Klamath River
Klamath
Prairie Creek Redwoods SP
Orick
Redwood National Park ASBS
Stone Lagoon
Humboldt Lagoons SP
Big Lagoon SWA
Big Lagoon
Patrick's Point SP
Trinidad SB
Trinidad
Kelp Beds at Trinidad Head ASBS
Little River SB
Manila Dunes RCGC (BLM)
Mad River Slough SWA
Arcata
Humboldt Bay NWR
Solmon Dunes Recreation Area (BLM)
Foy Slough SWA
Eureka
Humboldt Bay
South Spit Area (BLM)
Elk River SWA
Humboldt Bay NWR
Eel River SWA
Clem Miller SS
(Eel River to Pudding Creek)
Lost Coast Headlands (BLM)
Ferndale
Eel River
Cape Mendocino
Mattole River
King Range NCA ASBS
King Range MRPA ERes
King Range NCA
60,000 acres located between the Mattole River in Humboldt Co. and Sinkyone Wilderness SP in Mendocino Co.
Shelter Cove
King Range NCA ASBS
Sinkyone Wilderness SP
Westport-Union Landing SB
Westport
MacKerricher SP
Clem Miller SS
Fort Bragg
Jughandle SRes, Pygmy Forest Ecological Staircase ASBS
Point Cabrillo Res
Mendocino Coast SS
(Jughandle Creek to Gualala River)
Caspar
Russian Gulch SP
Caspar Headlands SB, SRes
Mendocino
Mendocino Headlands SP
Van Damme SP
Albion
Greenwood SB
Elk
Ukiah
Manchester SP
Manchester
Stornette Ranch Property (BLM)
Point Arena
Schooner Gulch SB
Kelp Beds at Saunders Reef ASBS
Anchor Bay
Mendocino Coast SS
Sonoma Coast SS
(Gualala River to Bodega Head)
Gualala River
Gualala
Fort Ross
Santa Rosa
* Lakes Earl and Talawa SP
This is a significant property for which the Dept of Parks and Recreation has expressed its intention to have staff do the work necessary to obtain their classification by action of the Park and Recreation Commission.
Map prepared by California Coastal Commission Technical Services Division
JVC, ETO, ACH, PDS 2/97

02016.02-018 (3/05)

Figure 1-4b
Ocean and Coastal Managed Areas, North Coast



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OCEAN AND COASTAL
MANAGED AREAS
Map 2 of 4: North Central Coast

ASBS Area of Special Biological Significance
ERes Ecological Reserve
Ref Refuge
Res Reserve
SB State Beach
SHP State Historic Park
SP State Park
SRA State Recreation Area
SRes State Reserve
SS State Seashore
SWA State Wildlife Area
UCRes University of California Natural Reserve
RNA Research Natural Area – Nat'l Park Service
NEP National Estuary Program
NERR National Estuarine Research Reserve
▨ National Marine Sanctuary
NRA National Recreation Area
NS National Seashore
NWR National Wildlife Refuge
MENDOCINO CO.
LAKE CO.
Lakeport
Manchester
Point Arena
Stornetta Ranch Property (BLM)
Mendocino Coast SS
Sonoma Coast SS (Gualala River to Bodega Head)
Gualala
Del Mar Landing ERes, ASBS
Kruse Rhododendron SRes
Salt Point SP
Gerstle Cove Res, ASBS
Fort Ross
Fort Ross SHP
SONOMA CO.
Santa Rosa
NAPA CO.
SOLANO CO.
Sonoma Coast SB (includes 19 units)
Bodega Marine Life Ref, ASBS, UCRes
Sonoma Coast SS
Bodega Bay
Cordell Bank NMS Bndy
Bird Rock ASBS
Point Reyes NS 71,000 acres located between Tomales Pt. and Bolinas Pt. in Marin Co.
Estero de Limantour Res, RNA
Drakes Bay
Pt. Reyes
Point Reyes Headlands Res, ASBS
Double Point ASBS
Duxbury Reef ASBS, Res
Bolinas Quail Ref
Bolinas Bay
PACIFIC OCEAN
Gulf of the Farallones NMS Bndy
Farallon Is. Game Ref, ASBS, ERes, NWR
Farallon Is. (SF CO.)
Marconi Conference Center SHP
Petaluma Marsh SWA
Tomales Bay SP
Tomales Bay ERes
San Pablo Bay SWA
MARIN CO.
China Camp SP
Marin Islands NWR
San Rafael
Corte Madera Marsh ERes
Mt. Tamalpais SP
SAN FRANCISCO CO.
Golden Gate NRA
Candlestick Pt. SRA
Lake Merced
Thornton SB
Pacifica SB
Pacifica
Gray Whale Cove SB
Montara SB
James V. Fitzgerald ASBS, Marine Res (Marine Life Ref)
Año Nuevo SS (Pillar Pt. to Santa Cruz)
Half Moon Bay
Half Moon Bay SB
SAN MATEO CO.
Monterey Bay NMS Bndy
San Gregorio SB
Pomponio SB
Pescadero SB
Bean Hollow SB
Año Nuevo SRes, ASBS
Pt. Ano Nuevo
Año Nuevo Island UCRes
Coast Dairies Properties (BLM)
Año Nuevo SS
SANTA CRUZ CO.
Santa Cruz
Napa
Napa Sonoma Marshes SWA
San Pablo Bay NWR
San Pablo Bay
Fairfield
Fagan Marsh ERes
Peytonia Sl. ERes
Hill Sl. SWA
Grizzly Is. SWA
Brannon Is. SRA
Benicia SRA
Suisun Bay
Decker Is. SWA
Franks Tract SRA
Martinez
San Francisco Bay NERR Proposed reserve includes eight sites in the San Pablo Bay and Delta areas
Lower Sherman Is. SWA
Antioch Dunes NWR
Albany Mudflats ERes
CONTRA COSTA CO.
San Francisco Bay
Angel Is. SP
Oakland
Robt. W. Crown SB, Res
San Leandro Waterfowl Ref
San Francisco Bay NEP Includes the San Francisco, San Pablo and Suisun Bays, the Sacramento–San Joaquin Delta and their watersheds
ALAMEDA CO.
San Francisco Bay NWR
Redwood City
Redwood Shores ERes
Bair Island ERes
San Jose
SANTA CLARA CO.
North Central Coast Area
Scale 1:1,000,000
1 inch equals approximately 16 miles
10 0 10 20 30 40 MI
10 0 10 20 30 40 KM

★Golden Gate National Recreation Area
73,000 acres located between Tomales Bay in Marin County to Sweeney Ridge in San Mateo County, including Muir Woods National Monument, the Marin Headlands, Alcatraz Island, San Francisco Maritime National Historic Park, Fort Mason, Crissy Field, Fort Point National Historic Site, and other coastal-fronting areas.

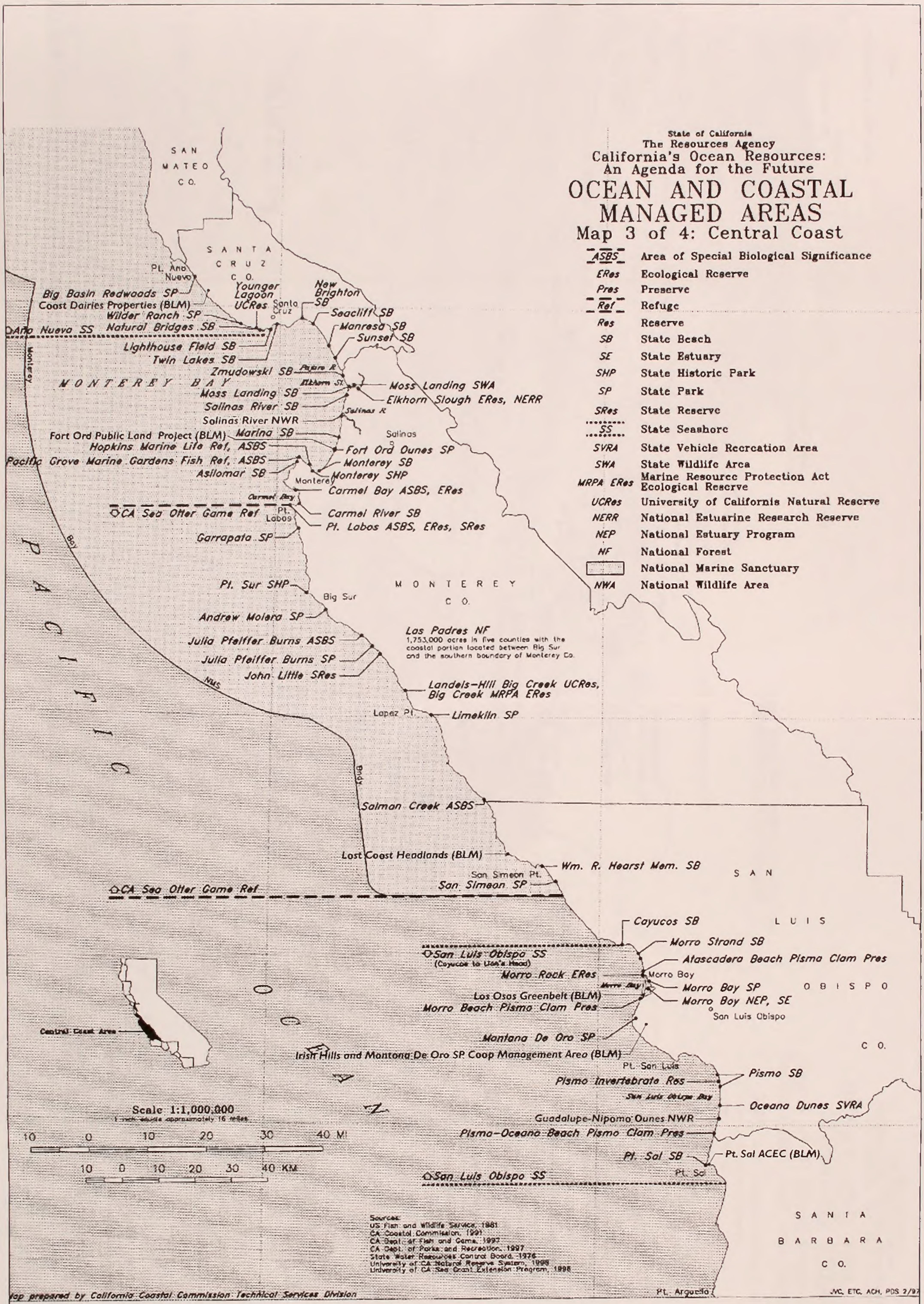
State Park System: Properties not approved for classification
Point Montara Light Station, Pigeon Point Lighthouse, and East Bay Shoreline are properties which are not classified and are not expected to be classified in the foreseeable future. However, these properties have such a significant association with the State Park System that the Dept. of Parks and Recreation has determined that they should be considered part of the State Park System.

Map prepared by
California Coastal Commission Technical Services Division

Sources:
US Fish and Wildlife Service, 1981
CA Coastal Commission, 1991
CA Dept of Fish and Game, 1997
CA Dept. of Parks and Recreation, 1997
State Water Resources Control Board, 1976
University of CA Natural Reserve System, 1996
University of CA Sea Grant Extension Program, 1998

JVC, LTC, ACM, PDS, 2/9

Figure 1-4c
Ocean and Coastal Managed Areas, North Central Coast


State of California
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California's Ocean Resources:
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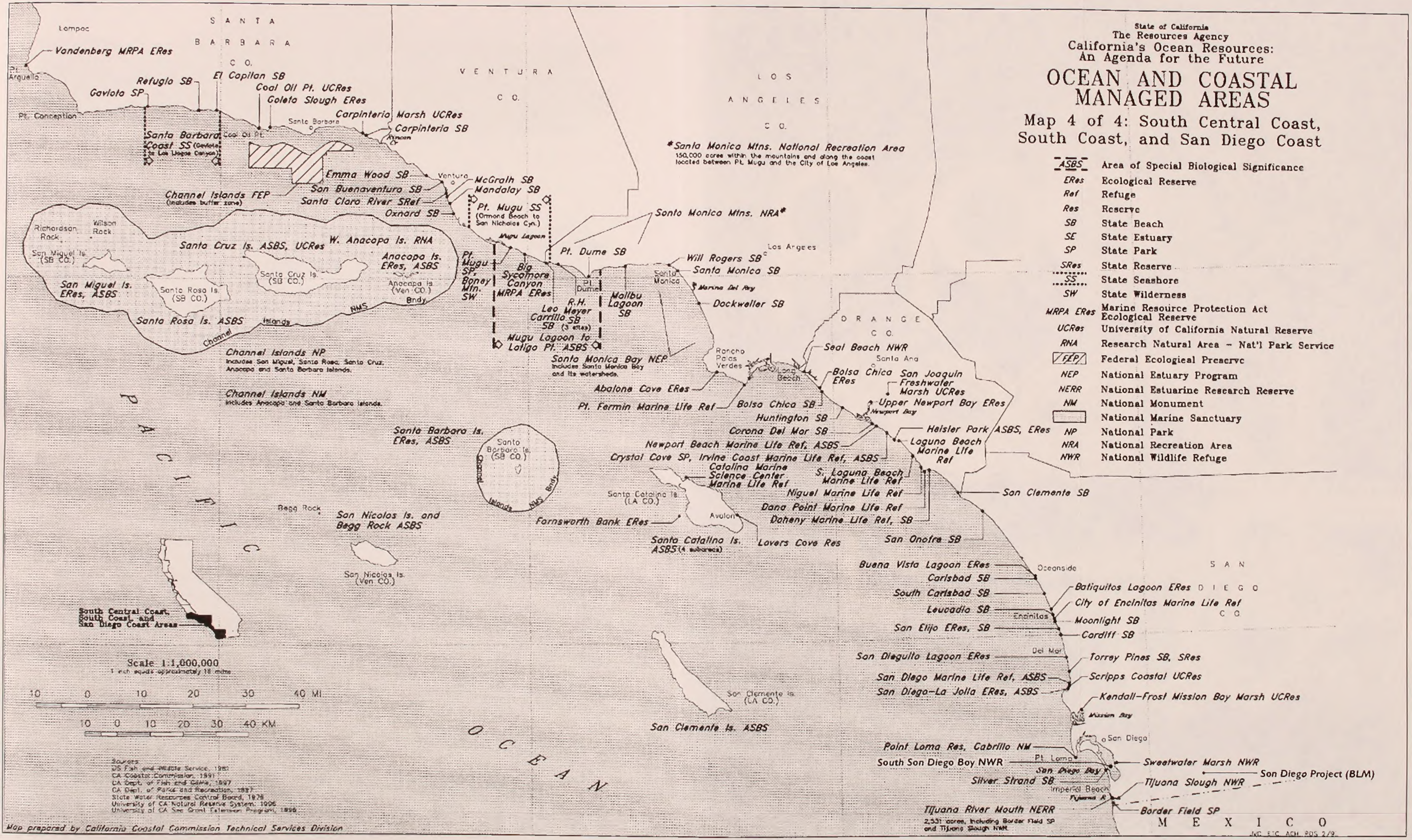
OCEAN AND COASTAL
MANAGED AREAS
Map 3 of 4: Central Coast
ASBS Area of Special Biological Significance
ERes Ecological Reserve
Pres Preserve
Ref Refuge
Res Reserve
SB State Beach
SE State Estuary
SHP State Historic Park
SP State Park
SRes State Reserve
SS State Seashore
SVRA State Vehicle Recreation Area
SWA State Wildlife Area
MRPA ERes Marine Resource Protection Act Ecological Reserve
UCRes University of California Natural Reserve
NERR National Estuarine Research Reserve
NEP National Estuary Program
NF National Forest
▭ National Marine Sanctuary
NWA National Wildlife Area
SAN MATEO CO.
SANTA CRUZ CO.
Pt. Ano Nuevo
Big Basin Redwoods SP
Coast Dairies Properties (BLM)
Wilder Ranch SP
Año Nuevo SS
Natural Bridges SB
Younger Lagoon UCRes
Santa Cruz
New Brighton SB
Seacliff SB
Manresa SB
Sunset SB
Lighthouse Field SB
Twin Lakes SB
Zmudowski SB
Pajaro R.
MONTEREY BAY
Elkhorn Sl.
Moss Landing SWA
Elkhorn Slough ERes, NERR
Moss Landing SB
Salinas River SB
Salinas R.
Solinas River NWR
Fort Ord Public Land Project (BLM)
Marina SB
Salinas
Hopkins Marine Life Ref, ASBS
Fort Ord Dunes SP
Pacific Grove Marine Gardens Fish Ref, ASBS
Monterey SB
Asilomar SB
Monterey SHP
Monterey
Carmel Bay ASBS, ERes
Carmel Bay
CA Sea Otter Game Ref
Pt. Lobos
Carmel River SB
Pt. Lobos ASBS, ERes, SRes
Garrapata SP
Monterey Bay NMS
PACIFIC OCEAN
Pt. Sur SHP
Big Sur
MONTEREY CO.
Andrew Molera SP
Los Padres NF
1,753,000 acres in five counties with the coastal portion located between Big Sur and the southern boundary of Monterey Co.
Julia Pfeiffer Burns ASBS
Julia Pfeiffer Burns SP
John Little SRes
Landels-Hill Big Creek UCRes, Big Creek MRPA ERes
Lopez Pt.
Limekiln SP
Bndy
Salmon Creek ASBS
Lost Coast Headlands (BLM)
Wm. R. Hearst Mem. SB
San Simeon Pt.
San Simeon SP
CA Sea Otter Game Ref
SAN LUIS OBISPO CO.
Cayucos SB
Morro Strand SB
San Luis Obispo SS
(Cayucos to Uce's Head)
Atascadero Beach Pismo Clam Pres
Morro Rock ERes
Morro Bay
Morro Bay SP
Morro Bay NEP, SE
Los Osos Greenbelt (BLM)
Morro Beach Pismo Clam Pres
San Luis Obispo
Montana De Oro SP
Irish Hills and Montana De Oro SP Coop Management Area (BLM)
Central Coast Area
Pt. San Luis
Pismo SB
Pismo Invertebrate Res
San Luis Obispo Bay
Oceano Dunes SVRA
Guadalupe-Nipomo Dunes NWR
Pismo-Oceano Beach Pismo Clam Pres
Pt. Sal SB
Pt. Sal ACEC (BLM)
Pt. Sal
San Luis Obispo SS
SANTA BARBARA CO.
Pt. Arguello
Scale 1:1,000,000
1 inch equals approximately 16 miles
10 0 10 20 30 40 MI
10 0 10 20 30 40 KM
JVC, ETC, ACH, PDS 2/97

Sources:
US Fish and Wildlife Service, 1981
CA Coastal Commission, 1991
CA Dept. of Fish and Game, 1997
CA Dept. of Parks and Recreation, 1997
State Water Resources Control Board, 1976
University of CA Natural Reserve System, 1998
University of CA Sea Grant Extension Program, 1998

Map prepared by California Coastal Commission Technical Services Division

Figure I-4d
Ocean and Coastal Managed Areas, Central Coast


State of California
The Resources Agency
California's Ocean Resources: An Agenda for the Future
OCEAN AND COASTAL MANAGED AREAS
Map 4 of 4: South Central Coast, South Coast, and San Diego Coast
ASBS Area of Special Biological Significance
ERes Ecological Reserve
Ref Refuge
Res Reserve
SB State Beach
SE State Estuary
SP State Park
SRes State Reserve
SS State Seashore
SW State Wilderness
MRPA ERes Marine Resource Protection Act Ecological Reserve
UCRes University of California Natural Reserve
RNA Research Natural Area - Nat'l Park Service
FEP Federal Ecological Preserve
NEP National Estuary Program
NERR National Estuarine Research Reserve
NM National Monument
National Marine Sanctuary
NP National Park
NRA National Recreation Area
NWR National Wildlife Refuge
SANTA BARBARA CO.
VENTURA CO.
LOS ANGELES CO.
ORANGE CO.
SAN DIEGO CO.
MEXICO
PACIFIC OCEAN
Lompoc
Vandenberg MRPA ERes
Pt. Arguello
Refugio SB
El Capitan SB
Coal Oil Pt. UCRes
Goleta Slough ERes
Gaviota SP
Pt. Conception
Santa Barbara
Carpinteria Marsh UCRes
Carpinteria SB
Rincon Cr.
Santa Barbara Coast SS (Gaviota to Las Llagas Canyon)
Coal Oil Pt.
Emma Wood SB
Ventura
San Buenaventura SB
McGrath SB
Mandalay SB
Channel Islands FEP (includes buffer zone)
Santa Clara River SRef
Oxnard SB
Pt. Mugu SS (Ormond Beach to San Nicholas Cyn.)
Mugu Lagoon
Richardson Rock
Wilson Rock
San Miguel Is. (SB CO.)
Santa Cruz Is. ASBS, UCRes
W. Anacapa Is. RNA
Anacapa Is. ERes, ASBS
Santa Cruz Is. (SB CO.)
Anacapa Is. (Ven CO.)
Bndy
San Miguel Is. ERes, ASBS
Santa Rosa Is. (SB CO.)
Santa Rosa Is. ASBS
Channel Islands NMS
Pt. Mugu SP, Boney Mtn. SW
Big Sycamore Canyon MRPA ERes
Pt. Dume SB
Pt. Dume
Leo Carrillo SB
R.H. Meyer SB (3 sites)
Malibu Lagoon SB
Mugu Lagoon to Latigo Pt. ASBS
Santa Monica Mtns. National Recreation Area*
*150,000 acres within the mountains and along the coast located between Pt. Mugu and the City of Los Angeles.
Santa Monica Mtns. NRA*
Will Rogers SB
Los Angeles
Santa Monica SB
Santa Monica
Marina Del Rey
Dockweiler SB
Channel Islands NP
Includes San Miguel, Santa Rosa, Santa Cruz, Anacapa and Santa Barbara Islands.
Channel Islands NM
Includes Anacapa and Santa Barbara Islands.
Santa Monica Bay NEP
Includes Santa Monica Bay and its watersheds.
Rancho Palos Verdes
Long Beach
Abalone Cove ERes
Pt. Fermin Marine Life Ref
Bolsa Chica SB
Seal Beach NWR
Santa Ana
Bolsa Chica ERes
San Joaquin Freshwater Marsh UCRes
Upper Newport Bay ERes
Newport Bay
Huntington SB
Corona Del Mar SB
Newport Beach Marine Life Ref, ASBS
Heisler Park ASBS, ERes
Laguna Beach Marine Life Ref
Crystal Cove SP, Irvine Coast Marine Life Ref, ASBS
Catalina Marine Science Center Marine Life Ref
S. Laguna Beach Marine Life Ref
Niguel Marine Life Ref
Dana Point Marine Life Ref
Doheny Marine Life Ref, SB
San Clemente SB
Santa Barbara Is. ERes, ASBS
Santa Barbara Is. (SB CO.)
Channel Islands NMS Bndy
Santa Catalina Is. (LA CO.)
Avalon
Begg Rock
San Nicolas Is. and Begg Rock ASBS
Farnsworth Bank ERes
Santa Catalina Is. ASBS (4 subareas)
Lovers Cove Res
San Onofre SB
San Nicolas Is. (Ven CO.)
South Central Coast, South Coast, and San Diego Coast Areas
Oceanside
Buena Vista Lagoon ERes
Carlsbad SB
South Carlsbad SB
Batiquitos Lagoon ERes
City of Encinitas Marine Life Ref
Leucadia SB
Encinitas
Moonlight SB
San Elijo ERes, SB
Cardiff SB
Del Mar
San Dieguito Lagoon ERes
Torrey Pines SB, SRes
San Diego Marine Life Ref, ASBS
Scripps Coastal UCRes
San Diego-La Jolla ERes, ASBS
Kendall-Frost Mission Bay Marsh UCRes
Mission Bay
Scale 1:1,000,000
1 inch equals approximately 16 miles
10 0 10 20 30 40 MI
10 0 10 20 30 40 KM
San Clemente Is. (LA CO.)
San Clemente Is. ASBS
San Diego
Point Loma Res, Cabrillo NM
Pt. Loma
South San Diego Bay NWR
San Diego Bay
Sweetwater Marsh NWR
San Diego Project (BLM)
Silver Strand SB
Imperial Beach
Tijuana Slough NWR
Tijuana R.
Tijuana River Mouth NERR
2,531 acres, including Border Field SP and Tijuana Slough NWR
Border Field SP
Map prepared by California Coastal Commission Technical Services Division
02016.02-018 (3/05)

Sources:
US Fish and Wildlife Service, 1982
CA Coastal Commission, 1991
CA Dept. of Fish and Game, 1997
CA Dept. of Parks and Recreation, 1997
State Water Resources Control Board, 1979
University of CA Natural Reserve System, 1996
University of CA Sea Grant Extension Program, 1996

Figure I-4e
Ocean and Coastal Managed Areas, South Central Coast, South Coast, and San Diego Coast

the rocks and islands within the California Offshore Rocks and Pinnacles Ecological Reserve are also part of the CCNM. The Ecological Reserve designation was implemented to provide protection for rare, threatened, or endangered native plants, wildlife, and aquatic organisms; and specialized terrestrial or aquatic habitat types. Public entry and use under this designation are required to be compatible with these purposes and are subject to rules and regulations as provided for in the regulations identified above. The Ecological Reserve will continue to be managed by DFG under the California Code of Regulations, Title 14.

1.9 Planning Period and Plan Revision

This plan is intended to provide the basis for long-term management of the CCNM. In analyzing the environmental effects of land use plan decisions, BLM assumed a 15- to 20-year time frame for analysis. Management must be adaptive, and management of the CCNM will occur in the context of changing human and natural conditions. The managing agencies recognize that the plan must be able to adapt to changing circumstances, such as new scientific information, new environmental laws, changing public demands, new management opportunities, or additions of rocks and islands to the CCNM. For this reason, plan monitoring and evaluation will be established as RMP implementation actions to ensure that the effects of planning decisions are tracked and reviewed on a regular basis. Evaluations will determine whether specific planning decisions remain valid or need to be revised.

The RMP will be evaluated about once every 4–6 years to determine the need for significant management modifications or amendments to the plan. Data from the resource monitoring and other sources will serve as input for the evaluation of the planning decisions to determine progress in implementation and determine whether any amendments or revisions to the RMP are necessary.

The evaluation will address the following questions (from BLM Handbook 1601-1):

- Are actions outlined in the plan being implemented?
- Does the plan establish desired outcomes (i.e., goals, standards, and objectives)?
- Are the allocations, constraints, and mitigation measures effective in achieving (or making progress toward achieving) desired outcomes?
- Have there been significant changes in the related plans of Indian tribes, state and local government, or other federal agencies that affect management at the CCNM?
- Are there new data or analysis that significantly affect the planning decisions or the validity of the NEPA analysis?
- Are there unmet needs or new opportunities that can best be met through a plan amendment or revision, or will current management practices be sufficient?
- Are new inventories warranted pursuant to BLM's duty to maintain inventories on a continuous basis (FLPMA Section 201)?
- Are there new legal or policy mandates as a result of new statutes, proclamations, executive orders, or court orders not addressed in the plan?

A plan amendment normally involves changing or adding management decisions that do not change the fundamental character of the overall plan or any of its major elements. A plan revision is made in response to significant new information or issues that warrant a major change in the management direction of the plan or one of its major elements. BLM planning guidelines specify that plan revisions may be considered in the following instances:

- In response to an evaluation of consistency with new laws, regulations, and policies;
- Upon determination that implementing the plan's decisions is not achieving the desired outcomes or meeting the plan's goals;
- When new science, data, or other information indicate a need to change decisions;
- Upon determination that the plan no longer provides adequate management direction; or
- When new proposals or actions not evaluated in the plan are put forth.

Both plan revisions and amendments require compliance with NEPA. Future plan revisions and amendments will be conducted in accordance with adopted BLM guidelines for community and stakeholder participation.

1.10 NEPA Provisions

NEPA requires that agencies proposing to plan or implement actions that may alter the environment evaluate potential environmental effects of such action and disclose them to decision makers and the public. If an action may result in significant adverse effects, the agency must identify feasible alternatives or planning/mitigation measures that can avoid or substantially lessen the identified impact.

This document is a joint RMP and EIS that is required by NEPA because significant adverse environmental effects could result from implementation of some land use alternatives. This document both presents management goals and direction for long-term management of the CCNM, and defines and evaluates alternative management approaches for specific issues identified in the public scoping process (discussed above and in Chapter 5). The foreseeable effects of each management alternative are identified and compared in this document.

This document addresses future management actions at a land use planning and program level, and indicates the extent and magnitude of these actions. Implementation of these programs will entail several years. Individual projects will be formulated, designed in detail, reviewed for potential environmental effects, modified as warranted, and implemented. Any environmental documents that must be prepared for future projects will be tiered to this document. This document provides an assessment of project effects that are generally expected to occur with program implementation, but further site-specific analysis will be conducted as necessary.

1.11 Process and Required Approvals to Adopt Approved RMP

This Proposed RMP and Final EIS is being made available for public review prior to BLM taking an action to issue a Record of Decision (ROD) in compliance with NEPA and release an Approved RMP. The decision whether to adopt the RMP will be made by the BLM California State Director.

1.11.1 Protest Process

Any person who participated in the planning process and has an interest that may be adversely affected may submit a protest. Decisions that are protestable are the goals, objectives, management actions, and allowable uses found in Chapter 2 and outlined in Table 2-3. The protest must be filed within 30 days of the date that the U.S. Environmental Protection Agency (EPA) publishes the notice of availability for the CCNM Proposed RMP/Final EIS in the *Federal Register*. Instructions for filing a protest with the Director of BLM regarding the Proposed Plan/Final EIS may be found at 43 CFR 1610.5 and are outlined below. A protest may raise only those issues that were submitted for the record during the planning process. E-mail and faxed protests will not be accepted as valid protests unless the protesting party also provides the original letter by either regular or overnight mail postmarked by the close of the protest period. Under these conditions, BLM will consider the e-mail or faxed protest as an advance copy, and it will receive full consideration.

If you wish to provide BLM with such advance notification, please direct faxed protests to the attention of the BLM protest coordinator at (202) 452-5112 and e-mails to Brenda_Hudgens-Williams@blm.gov.

Please direct the follow-up letter to the appropriate address provided below.

The protest must contain:

a. The name, mailing address, telephone number, and interest of the person filing the protest.
b. A statement of the issue or issues being protested;
c. A statement of the part or parts of the plan being protested;
d. A copy of all documents addressing the issue(s) that the protesting party submitted during the planning process or a statement of the date they were discussed for the record; and
e. A concise statement explaining why the protestor believes the State Director's decision is wrong.

All protests must be in writing and mailed to the following address:

Regular Mail:	Overnight Mail:
U.S. Bureau of Land Management	U.S. Bureau of Land Management
Director (210)	Director (210)
Attention: Brenda Williams	Attention: Brenda Williams
P.O. Box 66538	1620 L Street, N.W., Suite 1075
Washington, D.C. 20035	Washington, D.C. 20036

The Director will promptly render a decision on the protest. The decision will be in writing and will be sent to the protesting party by certified mail, return receipt requested. The decision of the Director shall be the final decision of the Department of the Interior.

1.11.2 Review by the Governor

In addition to a 30-day protest period, the BLM also must provide a 60-day review period to the Governor of the state in which the RMP (amendment) is being proposed, to ensure consistency with state and local plans, policies, and programs. The protest period and the Governor's review period should occur simultaneously in order to save time. Sending a print-ready copy to the Governor at the same time the document goes to the printer will allow both periods to end at about the same time. Furthermore, the BLM can potentially negotiate a shorter review period with the Governor.

Any responses from a Governor on consistency must be resolved before the BLM issues an ROD. If the Governor does not respond within the review period, BLM can assume that the proposed land use plan (amendment) decisions are consistent. If the Governor recommends changes in the proposed plan (amendment) that were not raised during the public participation process, the State Director shall provide the public with an opportunity to comment on the recommendations (43 CFR 1610.3-2[e]). This public comment opportunity will be offered for 30 days and may coincide with the 30-day comment period for the Notice of Significant Change (see below). If the State Director does not accept the Governor's recommendations, the Governor has 30 days to appeal in writing to the BLM Director (43 CFR 1610.3-2[e]).

If the Governor's protest letters and comments result in the need to significantly modify the Proposed RMP/Final EIS, BLM must announce the intended changes to the public and provide a 30-day comment period. Without this step, the public would not have an opportunity to understand and respond to the potential change (43 CFR 1610.5-1[b] and 40 CFR 1505.2). BLM must then respond to the comments. Should the BLM issue a Notice of Significant Change, it also may be necessary to issue a Supplemental Proposed RMP/ Final EIS.

1.11.3 Agency Consultation

Concurrent with this process, BLM will formally consult with FWS and NMFS to obtain opinions about whether implementation of the RMP is likely to jeopardize the continued existence of the several listed threatened and endangered species in the CCNM area. This process may result in the agencies' determination that elements of the RMP should be modified to minimize an adverse effect. Such modifications to the RMP will be made before it is finalized for adoption.

In addition, BLM will consult with the California Coastal Commission to obtain a determination regarding whether the proposed RMP is consistent with the provisions of the California Coastal Act.

Chapter 2. Proposed Resource Management Plan

The Proposed RMP includes the policies and guidance BLM and its partners intend to implement to meet their management responsibilities for the CCNM.

The goals of the Proposed RMP are to:

- Protect the geologic formations and the habitat that they provide for biological resources of the CCNM.
- Protect the scenic and cultural values associated with the CCNM.
- Provide and promote research opportunities to understand the resources and values of the CCNM.
- Provide the public with interpretive information and educational initiatives regarding the values and significance of the CCNM and the fragile ecosystems of the California coastline.
- Coordinate planning and management activities with the numerous jurisdictions on and adjacent to the CCNM, and use the CCNM to help enhance cooperative and collaborative initiatives and partnerships with a variety of communities, agencies, organizations, academic institutions, the public, and other stakeholders.

The RMP proposes that BLM, DFG, and DPR accomplish their goals by preparing a comprehensive site characterization of the CCNM; identifying and protecting resources of the CCNM through a variety of methods, including educational and interpretive programs; facilitating non-intrusive coastal research; and developing partnerships.

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Chapter 2

Proposed Resource Management Plan

2.1 Introduction

This chapter presents the proposed management strategy for the CCNM. The proposed strategy was formulated through an analysis of current management practices; an issue-identification process directed at affected agencies and the public; an interdisciplinary development effort involving the core BLM planning team, and agencies and organizations that are cooperating with BLM in the RMP process; evaluation of the four alternative management strategies presented in the Draft RMP/Draft EIS; and a consideration of the comments received on the Draft RMP/Draft EIS. Chapter 1, "Introduction," describes the legal framework within which this plan must fit.

The proposed strategy described in this chapter is capable of achieving the overall vision as outlined in the Presidential Proclamation and the management goals discussed in Chapter 1. A detailed description of the Proposed RMP is followed by an overview of the management approach for the monument.

2.2 Proposed Resource Management Plan

A description of management goals is first provided, along with their relationship to the objectives described for each of the various program areas. A description of management actions within each program area is provided, including objectives, management actions, allowable uses, and a description of the operating framework, where applicable. A summary of management actions in the Proposed RMP is provided in Table 2-1 (at the end of the chapter).

2.2.1 Management Goals

The goals for management of the CCNM are as follows:

Goal 1: Protect the geological formations and the habitat that they provide for biological resources of the CCNM.

Goal 2: Protect the scenic and cultural values associated with the CCNM.

Goal 3: Provide and promote research opportunities to understand the resources and values of the CCNM.

Goal 4: Provide the public with interpretive information and educational initiatives regarding the values and significance of the CCNM and the fragile ecosystems of the California coastline.

Goal 5: Coordinate planning and management activities with the numerous jurisdictions on and adjacent to the CCNM and use the CCNM to help enhance cooperative and collaborative initiatives and partnerships with a variety of communities, agencies, organizations, academic institutions, the public, and other stakeholders.

2.2.2 Management of Resources

A discussion of management actions for the following resources is provided:

- Geologic, soil, and paleontologic resources;
- Cultural resources;
- Vegetation resources;
- Wildlife resources;
- Intertidal resources; and
- Visual resources.

Geologic, Soil, and Paleontologic Resources

Objectives

OJ-GEO-1 Maintain the natural quality and integrity of geologic and soil resources.

OJ-GEO-2 Restore the quality and integrity of these resources to natural conditions where they have been impaired as a result of human activities.

OJ-GEO-3 Allow for excavation and data recovery where unique resources exist that are threatened by natural processes or human activity.

Management Actions

MA-GEO-1 **Data Recovery.** Where unique paleontologic resources exist that are threatened by natural processes or human activity, allow for excavation and data recovery, if it is determined that this action will not adversely affect sensitive biological, physical, or cultural resources or resource values.

MA-GEO-2 **Education and Interpretation.** Develop educational and interpretive materials that identify the nature and value of physical resources of the monument (discussed in more detail under the resource use “Education and Interpretation”).

MA-GEO-3 **Management Criteria.** Develop criteria for identifying resources requiring protection. Criteria will include, but not be limited to, the unique nature of the resource in question, the sensitivity of the resource to disturbance, and the threat or potential threat to the resource. Identify areas requiring additional management based on the above criteria.

This process will be ongoing as information becomes available through research and inventory.

MA-GEO-4 **Research.** Following any research, maintain an inventory of monument resources.

Allowable Uses

AU-GEO-1 **Protection of Resource.** Allow on-monument activities that would not harm the physical resources of the monument (discussed in more detail under the resource uses "Recreation" and "Land Use Authorizations").

AU-GEO-2 **Mineral Removal.** Specific resource protections contained in existing BLM land withdrawals and guidance contained in the Presidential Proclamation prohibit removal of minerals with commercial value from the CCNM.

Operating Framework

FR-GEO-1 **Research.** Encourage research that can better define the extent, nature, and value of physical resources of the monument (discussed in more detail under the "Research" resource use category).

Cultural Resources

Objectives

OJ-CUL-1 Protect NRHP-eligible and potentially eligible cultural resources from human-caused disturbance or destruction, and from natural disturbance and destruction when appropriate.

OJ-CUL-2 Obtain scientifically and ethnographically relevant information from the resources to inform us about past human activities, to evaluate cultural resources, and for site characterization.

OJ-CUL-3 Offer ongoing interpretation of cultural resources as a means of enhancing public appreciation.

Management Actions

MA-CUL-1 **Initial Management.** As an interim management action while NRHP determinations are in process, cultural resources will be managed for their information, public, or conservation values per BLM Manual 8100, FLPMA, and NHPA. Until formal NRHP eligibility determinations are made in consultation with the SHPO, each known resource will be managed as if it were a significant cultural resource.

MA-CUL-2 **Eligibility of CCNM Properties for Listing in the NRHP.** Prepare nominations as appropriate for cultural resources in the CCNM that are potentially eligible for listing in the NRHP. Obtain a determination of which cultural resources are suitable for listing.

MA-CUL-3 **Cultural Resources Management Plans (CRMPs).** CRMPs that address preservation actions may be prepared for cultural resources as determined to be appropriate for management purposes, including management of site visitation.

MA-CUL-4 **Consultation with Tribes.** BLM will consult further with Native American tribes to gather information about traditional use areas and activities that may include elements of the CCNM in order to support the allowable uses as identified below under AU-CUL-1.

MA-CUL-7 **Education and Interpretation.** An education and interpretation program will be developed around the CCNM's significant cultural properties (discussed in more detail under the resource use "Education and Interpretation"). The program may include printed and web-based material and also may involve public events organized around historic and/or prehistoric themes at or near significant coastal sites.

MA-CUL-7 **Research.** Research for the purposes of evaluation, site characterization, and scientific investigation is encouraged when such research is consistent with the objectives of the RMP, the BLM Statewide Protocol Agreement, and CRMPs developed under the umbrella of the Protocol.

Allowable Uses

AU-CUL-1 **Native American Uses.** Native American requests to practice traditional activities or participate in interpretive activities on the CCNM will be welcomed and will be approved on a case-by-case basis, consistent with the overriding purpose of monument management—which is preservation of biological, physical, and cultural resources contained on the rocks and islands of the monument.

AU-CUL-2 **On-Monument Activities.** On-monument activities that would harm the cultural resources of the monument will be limited or prohibited as appropriate (specific activities are discussed in more detail under the resource uses "Recreation" and "Land Use Authorizations"). Inadvertent or unanticipated discoveries will be treated according to the terms of the State Protocol Agreement.

Operating Framework

FR-CUL-1 **Management Guidelines.** The primary source for guidance of management activities concerning cultural resources is the BLM Statewide Protocol Agreement and its associated appendices, amendments, and plans. The BLM 8100 Series Manual, incorporated within the State Protocol Agreement, provides detailed management guidelines.

FR-CUL-2 **Consultation with Tribes.** Establish a program of government-to-government consultation with federally recognized Native American tribes. Involving tribal governments and the SHPO closely at the outset of planning will facilitate coordination and consultation at later stages of planning and management of local rocks and islands of interest to these tribes. Develop relationships with non-federally recognized Native American groups who may have an interest in stewardship of offshore traditional cultural properties (TCPs).

FR-CUL-3 **Monitoring and Protection.** Enforce laws against damage and theft of cultural resources. Administrative and physical measures to protect historic properties in the CCNM will include monitoring of resource condition, surveillance by law enforcement personnel in potential problem areas, public education, and involvement of interested parties in conformance with the Archaeological Resources Protection Act (ARPA).

FR-CUL-4 **Education and Interpretation.** Collaboration with various entities will be undertaken to provide interpretive opportunities.

FR-CUL-5 **Research.** Encourage research that can better define the extent, nature, and value of cultural resources of the monument (discussed in more detail under the "Research" resource use category). Cooperate with DPR, regional information centers of the California Historical Resources Information System (CHRIS), and Native American groups represented along the coast. Additional collaborators may be engaged, including faculty, graduate students, and research associates of the University of California and the California State University systems—and private universities that conduct anthropological research off California's mainland. For example, the Cotsen Institute of Archaeology at UC Los Angeles sponsors archaeological research on the Channel Islands and Farallones and the UC Davis Bodega Bay Marine Laboratory sponsors research related to Coast Miwok intertidal resource procurement. Partnering with academic institutions to facilitate and encourage research opportunities will help to fill cultural resource data gaps in the CCNM.

Vegetation Resources

This discussion addresses both the terrestrial and intertidal vegetation contained within the CCNM.

Objectives

OJ-VEG-1 Maintain the natural quality and integrity of native vegetation on the CCNM.

OJ-VEG-2 Restore the quality and integrity of native vegetation where it has been determined to be impaired as a result of human activities or non-native invasive species.

Management Actions

MA-VEG-1 **Criteria for Management.** Documentation that harm to a listed plant species is occurring will be an overriding criterion for implementing management action. As an initial step in RMP implementation, additional criteria will be developed for identifying the plant species and communities requiring management and protection. Criteria will include, but not be limited to, the unique nature of the resource in question, the sensitivity of the resource to disturbance, and the threat or potential threat to the resource.

MA-VEG-2 **Site Inventory.** An inventory of vegetation and vegetation communities will be maintained. As part of the site inventory, BLM will make elimination of the identified gaps in knowledge about the distribution and status of plant species a primary goal (discussed in more detail under the "Research" resource use category).

On the basis of the above activities and the criteria developed under MA-VEG-1, BLM will work cooperatively with DFG, DPR, FWS, and other agencies to identify rocks and islands in need of management attention. This identification process will be a dynamic one. As new information comes to light, site status will be changed appropriately.

MA-VEG-3 **Adaptive Management.** A variety of management activities may be implemented in the specific areas identified for management under MA-VEG-2, including but not limited to:

- Targeted education to make CCNM users aware of existing or potential conflicts associated with important native plant communities in specific monument locations.
- Enforcement actions.
- Active management, including restoration or other forms of management intervention.
- Use restrictions, as described below under AU-VEG-1.

MA-VEG-4 **Invasive Non-Native Species Control.** Develop an invasive non-native plant species management and eradication program, consistent with the long-term protection of native plant communities. This program will be designed to reduce competition from nonnative plants and encourage the long-term survival of native plant communities.

An Integrated Pest Management approach will be applied to invasive non-native species infestations. Control measures primarily will consist of manual and mechanical removal, and use of fire. Removal of invasive plant species by manual means is the preferred method of eradication and will be used wherever possible. The use of herbicides will be restricted to specific situations when other alternatives are determined to be infeasible or ineffective. Any proposed use of herbicides will be conservative and will target specific weed individuals for a given species. Any herbicide use will be assessed using the NEPA process and will be made available for public comment.

Control measures will incorporate best management practices (BMPs) and other strategies to protect air quality, protect water quality, avoid adverse noise effects, and minimize erosion. Measures taken to remove or control invasive species will be planned carefully to ensure that no major adverse effects on native organisms or important monument resources will result (e.g., activities would be conducted outside relevant breeding seasons for seabirds and marine mammals). Other measures will be implemented to minimize any adverse effects on non-target species. Disturbed areas will be replanted with native plant species where natural recruitment is not expected. This replanting will be designed to reduce erosion and protect visual quality. Temporary degradation of visual resources also will be avoided through screening of ground disturbance activities where possible.

MA-VEG-5 **Education and Interpretation.** Develop educational and interpretive materials that identify the nature and value of vegetation resources of the monument (discussed in more detail under the resource use "Education and Interpretation").

MA-VEG-6 **Research.** Following any research, maintain an inventory of monument resources.

Allowable Uses

AU-VEG-1 **On-Monument Activities.** On-monument activities that would result in loss of native plants will not be allowed on the monument, unless otherwise permitted through BLM's normal procedures for granting access for research or other activities (specific activities are discussed in more detail under the resource uses "Recreation" and "Land Use Authorizations"). Management intervention normally will begin with the least restrictive approach (e.g., use ethics education), with access limitations implemented on the CCNM as a last resort. Such use limitations will be implemented only on a site-specific basis where known resource impacts exist and will use a science-based process to determine what limits are appropriate. In cases where initial surveys determine that the risk of resource damage is high, temporary closures or use limitations may be instituted immediately while further information is collected and long-term solutions determined. These will be the exception to normal management practices, however, and will be implemented only in situations where the potential for immediate and significant threats is identified. Temporary closures or limitations will be followed by a process (including public involvement) to determine long-term management solutions.

Operating Framework

FR-VEG-1 **Tiered Adaptive Management Approach.** BLM will use a tiered approach to adaptive management of native vegetation. The first tier will be to develop criteria for identification of locations that should receive management attention, including both the vegetation resources present and the existence of or potential for use conflicts. The second tier will involve performing a site inventory and monitoring vegetation and human use of the CCNM, as well as applying the criteria developed in the first tier, to identify the sites in need of management attention. The final tier will be implementing management actions as needed.

In cases where initial information determines that the risk of resource damage is high, management action may be instituted immediately while further information is collected and long-term solutions are determined. This will be the exception to normal management practices, however, and will be implemented only in situations where the potential for immediate and significant threats is identified. Temporary management actions will be followed by a process (including public involvement) to determine long-term management solutions.

FR-VEG-2 **Research.** Encourage research that can better define the extent, nature, and value of vegetation resources of the monument (discussed in more detail under the "Research" resource use category).

Wildlife Resources

This discussion addresses both the terrestrial and intertidal wildlife habitat contained within the CCNM.

Objectives

OJ-WLD-1 Maintain habitat for native populations of seabirds, pinnipeds, and intertidal species throughout the monument.

OJ-WLD-2 Restore habitat that has been adversely affected by human activity or non-native invasive species.

Management Actions

MA-WLD-1 **Criteria for Management.** Documentation that harm to a listed wildlife species is occurring will be an overriding criterion for implementing management action. As an initial step in RMP implementation, additional criteria will be developed for identifying the wildlife species and habitat types requiring management and protection. Criteria will include, but not be limited to, the unique nature of the resource in question, the sensitivity of the resource to disturbance, and the threat or potential threat to the resource.

MA-WLD-2 **Site Inventory.** An inventory of wildlife and wildlife habitat will be maintained. As part of the site inventory, BLM will make elimination of the identified gaps in knowledge about the distribution and status of seabirds and pinnipeds a primary goal (discussed in more detail under the "Research" resource use category). Other inventory priorities will be established and promoted at the outset, including:

- A monument-wide survey of seabird and pinniped populations coordinated with researchers studying marine birds and mammals. Surveys will occur at minimum 10-year intervals, using appropriate protocols, such as those developed by Sowls et al. (1980) and Carter (pers. comm.), that include recently developed survey techniques. The modifications of this survey protocol will preserve the ability to compare future data with these earlier benchmarks.
- Annual photographic documentation of conspicuous colonies of seabirds, such as cormorants, western gulls, and common murres. These annual photographs will be taken at an established time and under defined conditions each year so that the data are comparable over years and reflect, to the best extent possible, the maximum number of nesting birds.
- Focused surveys (especially in northern California and at sites in southern California potentially hosting Xantus' murrelets) for populations of nocturnal and burrow- and crevice-nesting species such as storm-petrels and the small alcids, as well as widespread species that nest in small numbers at any one site. Criteria for identifying inventory sites will include such characteristics as:
    - ☐ Rocks and islands with soil or extensive cavities that provide potential nesting sites for storm-petrels and burrowing alcids;

    - Cliffs that are inaccessible to terrestrial predators and have niches or crevices that are suitable nesting sites for pelagic cormorants and pigeon guillemots; and
    - Mussel flats adjacent to or part of rocks and islands that project above high waves sufficiently to allow oystercatcher nests.
- Additional focused annual surveys on selected species and sites based on partnership/stakeholder interest and abilities. For example, local groups or individuals could perform valuable long-term monitoring projects at sites where seabird and pinniped populations are visible from the mainland and counts of pinnipeds and nesting birds or assessments of their reproductive status can be conducted easily.
- Surveys to determine status regarding invasive wildlife species and their effects on native populations. Inventory efforts will include surveying for invasive species such as rodents (e.g. *Rattus* sp. and *Mus musculus*) and Canada goose (*Branta canadensis*).
- Surveys to determine status regarding human use of the CCNM and its effects on wildlife habitat and populations.
- Surveys for intertidal species.

The inventory will be accomplished through BLM activities and through partnerships. The task will be to identify specific data gaps, publicize the need for specific survey and status investigations, and cooperate with appropriate groups to enhance their ability to perform the necessary projects. Academic institutions, professional conservation organizations, private consultants, and local Audubon or docent/steward groups will be potential participants in these efforts—depending on the scope and the nature of the projects. Protocols for research will be carefully developed to ensure that they are cost effective and repeatable. Further, these protocols will specify who is qualified to perform the various types of research and surveys.

On the basis of the above activities, and the criteria developed under MA-WLD-1, BLM will work cooperatively with DFG, DPR, FWS, and other agencies and partners to identify rocks and islands in need of management attention. This identification process will be a dynamic one. As new information comes to light, site status will be changed appropriately. Appendix D provides preliminary lists of known seabird and marine mammal sites on the CCNM.

MA-WLD-3 **Adaptive Management.** A variety of management activities may be implemented in the specific locations identified for management under MA-WLD-2, including but not limited to:

- Targeted education to make CCNM users aware of existing or potential conflicts associated with wildlife habitat in specific monument locations, as part of MA-WLD-6.
- Enforcement actions, as described above under FR-WLD-3.
- Active management, including restoration or other forms of management intervention, including but not limited to the actions described below under MA-WLD-4 and MA-WLD-5.

- Use restrictions, as described below under AU-WLD-1.

MA-WLD-4 **Invasive Non-Native Species Control.** A program for control and eradication of invasive wildlife species on the CCNM rocks and islands will be developed and implemented where effects on native populations of seabirds and pinnipeds, and on other monument resources, have been documented or are suspected. Priorities for implementation will be given to areas where problems are most acute (such as areas where native populations are shown to be in decline as a result of invasive species). This effort will be designed to reduce competition with native wildlife, predation on native vegetation, and degradation of habitat—and will encourage the long-term survival of native or unique monument communities and habitat.

Measures taken to remove or control invasive species will be planned carefully to ensure that no major adverse effects on native organisms or important monument resources would result (e.g., activities will be conducted outside relevant breeding seasons for seabirds and pinnipeds). BMPs and other measures will be implemented to minimize any adverse effects on non-target species, natural resources, and the human environment (including noise and air quality). Disturbed areas will be replanted with native plant species where natural recruitment is not expected. This replanting will be designed to reduce erosion and protect visual quality. Temporary degradation of visual resources also will be avoided through screening of ground disturbance activities where possible.

MA-WLD-5 **Restoration Measures.** BLM, in cooperation with its core-managing partners, will develop and implement measures to restore or improve habitat and to control predators.

MA-WLD-6 **Education and Interpretation.** Educational and interpretive materials will be developed that identify the nature and value of wildlife resources of the monument (discussed in more detail under the resource use "Education and Interpretation"). Signs and educational materials will be made available to the public near important marine mammal haul-outs, major tidepool areas, and marine bird nesting sites and at access points. A particular focus will be tidepools, as described in more detail in Section 2.3.3 under "Key Management Initiatives—Tidepool Connections."

Allowable Uses

AU-WLD-1 **On-Monument Activities.** As described above, where known conflicts with wildlife exist, activities that harm wildlife resources or access to particular sites may be restricted on the monument. Restrictions of access to the CCNM will be made considering local knowledge of seabird and pinniped use (e.g., known nesting and pupping seasons), existing and potential use conflicts, and enforcement considerations. Activities that will be closely managed during seasonal restrictions include those with the potential to disturb wildlife.

Management intervention normally will begin with the least restrictive approach (e.g., use ethics education), with seasonal access limitations implemented on the CCNM as a last resort. Such use limitations will be implemented only on a site-specific basis where known resource impacts exist and will use a science-based process to determine what limits are appropriate, for example known roosting, nesting, and pupping seasons for seabirds and marine mammals on that site. In cases where initial surveys determine that the risk of resource damage or significant wildlife disturbance is high, temporary closures or use limitations may be instituted immediately while further information is collected and long-term solutions are determined. These will be the exception to normal management practices, however, and will be implemented only in situations where the potential for immediate and significant threats is identified. Any temporary closures or limitations will be followed by a process (including public involvement) to determine long-term management solutions.

Operating Framework

FR-WLD-1 **Agency Coordination.** BLM will work with federal, state, and local partners to minimize or eliminate the need for additional listing of species under the ESA and to contribute to the recovery of the species already listed as such. Management actions for the CCNM have been designed and will be conducted in cooperation with other government agencies, in particular those with jurisdictional authority over the wildlife resource in question (e.g., DFG, NMFS, and FWS), as well as universities and colleges, nonprofit groups, consultants, and volunteers.

FR-WLD-2 **Pre-Existing Regulations.** Management actions will be implemented within the framework of pre-existing regulations (e.g., ESA and MMPA).

FR-WLD-3 **Enforcement.** Enforcement of any use restrictions and the existing laws protecting wildlife will be conducted in cooperation with a range of law enforcement agencies, including—but not limited to—BLM, FWS, NOAA, USCG, DFG, and DPR; and cities and counties. Initial enforcement efforts will be targeted at sites with important wildlife habitat that experience documented use conflicts, as described in the management actions below.

FR-WLD-4 **Tiered Adaptive Management Approach.** BLM will use a tiered approach to adaptive management of wildlife habitat. The first tier will be to develop criteria for identification of locations that should receive management attention. The criteria will take into consideration both the resources present and the existence of or potential for use conflicts. The second tier will involve performing a site inventory that characterizes wildlife habitat and populations, as well as human use of the CCNM. The third tier will involve applying the criteria developed in the first tier in order to identify the sites in need of management attention. The final tier will be to implement management actions as needed.

In cases where initial information determines that the risk of resource damage or significant wildlife disturbance is high, management action may be instituted immediately while further information is collected and long-term solutions are determined. This will be the exception to normal management practices, however, and will be implemented only in situations where the potential for immediate and significant threats is identified. Temporary management actions will be followed by a process (including public involvement) to determine long-term management solutions.

Intertidal Resources

As described on page 3.3-4 and shown in Figure 3.3-1 of the Draft RMP/Draft EIS, different sites in the CCNM contain varying portions of the intertidal zone, depending on level of exposure and wave action.

Portions of the CCNM include the uppermost horizon and the high and middle intertidal zones. Management of intertidal resources is addressed under the "Vegetation" and "Wildlife" resource programs above.

Visual Resources

Objectives

OJ-VRM-1 Manage all monument lands as VRM Class I, except where safety requirements for navigational aid visibility would conflict with this objective.

OJ-VRM-2 Enhance opportunities for visitors and residents to view the outstanding scenic landscapes characteristic of the CCNM.

Management Actions

MA-VRM-1 **Visual Contrast Ratings.** Complete visual contrast ratings for existing CCNM facilities and identify opportunities to reduce existing visual impacts through modifications (e.g., removing unused non-historic navigational devices and rehabilitating landscape scars).

Complete visual contrast ratings for all proposed surface-disturbing projects to ensure that they meet VRM class objectives.

MA-VRM-2 **Inventory of Vista Points.** Complete an inventory of existing and potential key scenic vista points along road and trail corridors adjoining the CCNM, and identify opportunities to work with core-managing and collaborative partners to improve these locations as overlooks and interpretive sites available to the public.

Allowable Uses

AU-VRM-1 **On-Monument Developments.** Any new site developments on BLM lands will be located and designed so that they do not detract from coastal vistas. New facilities will be constructed so that no or minimal impacts occur to the immediate coastal viewshed.

AU-VRM-2 **Aids-to-Navigation.** In areas where coastal rocks present navigation hazards, any analysis of safety/navigation aids will consider opportunities for placing aids in adjoining waters or land. Only where it is determined that these aids will not be effective elsewhere, or will cause greater impacts on the coastal landscape, will they be considered for on-monument placement. Where on-monument (i.e. on-rock) navigation aids are determined to be the only reasonable solution, efforts will be made to balance the need to provide for navigational safety while minimizing visual impacts.

Operating Framework

FR-VRM-1 **Agency Coordination.** Work with county governments, the California Coastal Commission, the USCG, and other agencies with management jurisdiction to ensure that coastal developments do not detract from the scenic integrity of the area.

FR-VRM-2 **Mainland Facilities.** Locate and design any new CCNM-related facilities on the mainland (for instance, on BLM partner lands) so that these facilities do not detract from coastal vistas. New facilities will be constructed so that no or minimal impacts occur to the immediate coastal viewshed.

2.2.3 Management of Resource Uses

Management of resource uses includes a discussion of management actions for the following:

- Recreation,
- Education and interpretation,
- Research,
- Land tenure adjustments,
- Land use authorizations,
- Special management, and
- Cadastral support.

Recreation

For the purposes of the proposed RMP, the discussion of recreation management is limited to recreational activities that occur on the CCNM itself. BLM does not have jurisdiction to regulate activities in the water, land, or airspace surrounding the CCNM.

Objectives

OJ-REC-1 Provide a use strategy with an appropriate level of recreational access to the CCNM.

OJ-REC-2 Provide for non-mechanized, minimal-impact recreational opportunities.

OJ-REC-3 Construction of recreational facilities on the CCNM will be minimal, and limited to those necessary for public safety or direct enjoyment of monument resources..

Management Actions

MA-REC-1 **User Experience.** The recreation approach for the monument will consist of primitive non-motorized, non-mechanized activities.

MA-REC-2 **Recreational Facilities.** BLM will place recreation facilities on the monument only when consistent with the resource protection goals of the plan.

MA-REC-3 **Signage.** Signage will be installed at key locations along the mainland regarding the allowed and prohibited recreational uses of the CCNM (discussed in more detail under

"Allowable Uses" below). Warning signs will be provided in hazardous areas with high visitation or acute risks.

MA-REC-4 **Research.** An inventory will be maintained for information generated by any recreation-related research.

MA-REC-5 **Educational Materials.** Educational and interpretive materials will be developed that identify the nature and value of recreational opportunities of the monument (see the "Education and Interpretation" program below). Printed and web-based resources will be generated that publicize the encouraged and prohibited recreational uses of the CCNM. The location of key recreation access points to the monument also will be described. Training materials, brochures, and educational information regarding protection of CCNM resources will be provided to other entities offering recreation along the coast (e.g., county parks employees and kayak rental companies).

Allowable Uses

AU-REC-1 **General.** Recreational uses of the monument will be allowed when consistent with the primitive non-motorized, non-mechanized goals and when consistent with proclamation goals and public safety concerns. The allowable uses described below further elaborate on allowed and restricted uses. Management intervention normally will begin with the least restrictive approach (e.g., use ethics education), with access limitations implemented on the CCNM as a last resort. Such use limitations will be implemented only on a site-specific basis where known resource impacts exist and will use a science-based process to determine what limits are appropriate. In cases where initial surveys determine that the risk of resource damage is high, temporary closures or use limitations may be instituted immediately while further information is collected and long-term solutions determined. These will be the exception to normal management practices, however, and will be implemented only in situations where the potential for immediate and significant threats is identified. Temporary closures or limitations will be followed by a process (including public involvement) to determine long-term management solutions.

AU-REC-2 **Recreational Facilities.** BLM will consider placing recreation facilities on the monument only when consistent with the resource protection goals of the plan.

AU-REC-3 **Organized Activities and Events.** Organized recreational activities and events will be allowed only through issuance of a special use permit and only when consistent with the plan's resource protection goals.

AU-REC-4 **Fishing.** Fishing from the CCNM will be allowed in accordance with the general fishing regulations. No person fishing from the CCNM shall take fish for commercial purposes except by permit.

AU-REC-5 **Motor Vehicles and Off-Highway Vehicle (OHV) Use.** No person shall drive, operate, leave, or stop any motor vehicle, bicycle, or other type of vehicle on the CCNM. The entire CCNM is designated as closed to vehicle travel under the BLM OHV regulations.

AU-REC-6 **Firearms.** No person shall fire or discharge any firearm, bow and arrow, air or gas gun, spear gun, or any other weapon of any kind within or into the CCNM—or possess such weapons within the CCNM, except law enforcement personnel and as provided for in individual area regulations that allow for hunting.

AU-REC-7 **Camping.** No person shall camp within the boundaries of the CCNM, for both public safety and resource protection reasons.

AU-REC-8 **Use of Fire.** No person shall light fireworks or other explosive or incendiary devices, or start or maintain any fire within the boundaries of the CCNM, except for management purposes as provided for in other portions of this plan.

AU-REC-9 **Aircraft.** No person shall use the CCNM as a launching or landing point for hang gliders, paragliders, ultralights, or any other motorized or non-motorized aircraft.

AU-REC-10 **Pets.** Pets, including dogs and cats, are prohibited from entering the CCNM unless they are retained on a leash of less than 10 feet.

AU-REC-11 **Rock Climbing.** Rock climbing using assistive devices is prohibited within the boundaries of the CCNM, unless authorized in association with research, restoration, or public health and safety purposes (e.g., aids-to-navigation).

AU-REC-12 **Non-Traditional and Newly Emerging Recreational Uses.** Non-traditional and newly emerging recreational uses will be allowed as long as they are consistent with CCNM goals (see AU-REC-1). Such uses will be monitored to assess potential conflicts, impacts on resources, or visitor safety issues.

Operating Framework

FR-REC-1 **Resource Protection.** Coastal visitors will be encouraged to participate in recreational pursuits on the CCNM that are respectful of the biological, cultural, physical, and scenic values of the monument.

FR-REC-2 **Public Safety.** The health and safety of coastal visitors is a central theme in managing recreation on the CCNM.

FR-REC-3 **Recreation Outside of CCNM Boundaries.** BLM does not plan to regulate recreation that is not within the boundaries of the CCNM. Because recreation in adjacent areas could in some instances affect monument resources, however, BLM will work with those entities already responsible for management of recreation access to the coast, including its core-managing partner DPR, NPS, and other entities as appropriate, to participate in decisions regarding recreation adjacent to monument lands.

FR-REC-4 **Research.** Research that can better define the extent, nature, and value of recreational opportunities of the monument will be encouraged (discussed in more detail under the "Research" resource use category).

Education and Interpretation

Objectives

OJ-EDU-1 Provide opportunities for year-round, outstanding environmental interpretation and education at the CCNM.

OJ-EDU-2 Leverage partnerships and integrate with existing educational and interpretive programs to foster an understanding, appreciation, and stewardship of CCNM and California coastal ecosystems resources.

OJ-EDU-3 Use existing mainland facilities to support education and interpretation programs to the maximum extent feasible, to minimize the need for additional mainland facilities.

OJ-EDU-4 Enable frequent contact between visitors and managing agency personnel to promote environmental education and protection of CCNM resources and resource values.

OJ-EDU-5 Offer a continuing program of outreach to foster environmental education and stewardship for CCNM protection and enhancement.

OJ-EDU-6 Increase the opportunities for socio-cultural and educational experiences by visitors.

Management Actions

MA-EDU-1 **Educational and Interpretive Facilities.** BLM will place educational and interpretive facilities on the monument only when consistent with the resource protection goals of the plan. New mainland facilities will be constructed in a manner consistent with the existing visual character of the coastal environment so as not to detract from existing scenic resources. These facilities will be located on the landward side of SR 1 to the maximum extent practicable to protect the quality of the scenic values of the CCNM and adjacent lands for persons traveling along that route.

MA-EDU-2 **Educational and Interpretive Plan(s).** Management of education and interpretation at the CCNM will be achieved through the development of an Education and Interpretation Plan, or a series of regional or site-specific plans, that will identify goals, themes, general guidelines, and an action plan for CCNM education and interpretation. As part of this plan, the following actions will be taken in coordination with the core-managing partners and other partnering entities, as appropriate:

- Expand on preliminary data to complete a comprehensive inventory of existing coastal facilities that could serve as visitor gateways. The inventory will address the criteria given below for selection of gateways.
- Identify mainland gateways where visitors will be able to receive educational and interpretive materials regarding the CCNM.
- Develop educational and interpretive programs at these visitor gateways, using existing or new BLM or partner facilities and infrastructure, as funding permits.
- Generate and distribute printed and web-based resources regarding the CCNM, using the guidance in the discussions below of "Virtual Monument" and

"Interpretive Themes." Educational and interpretive materials will be offered in multiple languages, as appropriate, to allow greater accessibility by non English-speaking populations.

BLM or its partners will organize or sponsor educational and interpretive activities on a regular basis, either on their own initiative or in response to requests from interested organizations. Activities will include opportunities for docent-led exploration. The purpose of these activities will be to impart environmental knowledge, foster respect for ecological systems, and nurture support for protection and enhancement of the CCNM's unique ecological resources.

One of the initial implementation priorities for the Education and Interpretation program will be Tidepool Connections as described in Section 2.3.3 under "Key Management Initiatives—Tidepool Connections."

MA-EDU-3 **CCNM Gateways.** A series of CCNM Gateways will be developed to provide a sense of place for the monument, serve as visitor contact points, and link the CCNM with local communities and local initiatives. These mainland visitor gateways have been identified and additional visitor gateways will be identified using the following criteria:

- Presence of appropriate pre-existing visitor facilities and infrastructure to accommodate CCNM educational exhibits and interpretation (e.g., visitor centers and parking and day use areas);
- Sensitivity of CCNM resources in the vicinity (e.g., proximity and sensitivity to disturbance from shoreline);
- Size and number of rocks and islands in the vicinity;
- Proximity to well traveled roads and frequently visited coastal public properties;
- Visual accessibility from nearby vistas, roads, and other coastal access points;
- Local community interests and concerns;
- Costs associated with establishing visitor contact and availability of funds; and
- Participation by partnering entities.

The CCNM Gateways will include a hosted site. Hosting will be performed by BLM and/or its partners, depending on the site. Examples include areas with visitor centers, nature centers, entrance kiosks, park or facility offices, or other appropriate types of visitor use facilities. Each CCNM Gateway will provide information regarding the specific gateway, including the various CCNM features associated with that specific portion of the CCNM. Information regarding the other established CCNM Gateways should also be available to the visitor. In addition, each gateway can develop educational initiatives specific to its unique resources and thematic focus. Each gateway is expected to develop its own local partnership and community outreach initiatives. Details regarding implementation of the CCNM Gateways program are discussed in Section 2.3.3, "Plan Implementation Priorities—Key Management Initiatives—CCNM Gateways."

MA-EDU-4 **Un-Hosted Visitor Sites.** A number of un-hosted visitor sites or "CCNM waysides" may be developed. These could include informational or interpretive kiosks or panels, as well as nature or viewing trails, if appropriate. Some of these sites may be directly associated with a CCNM Gateway, while others may not be. In all cases, they are intended to provide individuals and organizations opportunities for nature study and photography, interpretive sessions and walks, school and community outreach programs, and special thematic events related to the unique resources of the CCNM.

MA-EDU-5 **Provisions for Facility Construction.** Any facilities to be constructed will be built to applicable standards; BMPs and other measures will be implemented to avoid adverse effects on natural resources and the human environment. Any new facilities with potential for adverse effects will be subject to additional environmental review under NEPA.

Operating Framework

FR-EDU-1 **Mainland Focus.** BLM intends to use mainland facilities to the maximum extent and only conduct educational and interpretive programs on the monument lands where their use is integral to program effectiveness. BLM will work with DPR, Caltrans, and local counties and cities along the coast, as appropriate to ensure that educational and interpretive facilities along scenic routes (e.g., SR 1) preserve coastal vistas.

FR-EDU-2 **Virtual Monument.** An important component of the Education and Interpretation Plan for the CCNM is the Virtual Monument. This will be comprised of educational materials developed using a variety of media (e. g., internet and CD-ROM) that provides information about the monument's natural and cultural resources, its recreational amenities and access points, and travel information. The Virtual Monument programs will be targeted to specific user groups, including individuals planning a trip to the monument, those interested in learning about the monument and its related resources and resource values, and curriculum-based programs for school groups. Interactive maps and web-based geographic information systems (GIS) will allow users to browse the CCNM. Live cameras stationed along the coast may be installed to allow people to observe their favorite site in real time, and archives of photos and research reports will allow students to study the CCNM from their home or classroom. Travel planning calendars will highlight the seasonal viewing opportunities, scheduled programs, and special events along the coast. The Virtual Monument also will inform the public of habitat destruction that could occur if CCNM resources are accessed anywhere other than the designated interpretive points.

FR-EDU-3 **Interpretive Themes.** Interpretive themes are written statements that guide the design and written message of various products that may include wayside exhibits, visitor center exhibits, brochures, audiovisual presentations, and web sites. For the purposes of this plan, these themes are proposed for the development of a series of wayside interpretive panels that could be duplicated and installed at the CCNM visitor gateways (discussed in more detail under MA-EDU-3). Not every gateway will need all interpretive panels. It is anticipated that some of these themes will be presented in a statewide brochure and in a series of web pages to promote visitation to the monument.

Interpretive themes will be divided into three categories: general information about the CCNM, specific information about resources found within the monument, and information about recreational uses and limitations. Interpretive themes also will be further developed on a site-specific basis, with local messages that fit with the overall themes given below. A preliminary list of themes includes the following (a more detailed list is included in Appendix E):

- The CCNM is a refuge from mainland activities.
- The CCNM is a major migration corridor that is composed of all of the rocks and islands.
- The CCNM is the last land-based frontier for research on coastal resources.
- The CCNM represents the connection between land and sea on California's coast.
- All elements of CCNM management are achieved through partnerships.
- The CCNM is a unique recreational opportunity.
- Views of the CCNM represent the vastness of the ocean.
- The CCNM's rocks and islands have historically been and will continue to be used by people.

Research

Objectives

OJ-RSR-1 Manage a broad range of research efforts in the CCNM to achieve a balance between gathering important scientific data needed to understand and protect the ecological integrity (including the physical, biological, and socio-cultural dimensions) of the CCNM and protecting that integrity from intrusion of the research process.

OJ-RSR-2 Consolidate the existing research permitting processes administered by multiple agencies into a single process.

Management Actions

MA-RSR-1 **Research/Monitoring Permit System.** Research will be permitted throughout the CCNM. Permits will be required for scientific studies on CCNM land that involve field work or specimen collection with the potential to disturb resources.

In coordination with the core-managing partners, BLM will develop research/ monitoring permit stipulations that will be used by all three agencies in permitting and sharing research related to the CCNM. The core-managing partners will coordinate and consult on all major research permit decisions. The permit stipulations for on-monument use will also be consistent with current BLM requirements under 43 CFR 2920, "Leases, Permits, and Easements through Issuance of a Special Use Permit." When permits are required for scientific activities pertaining solely to cultural and paleontological resources, including archaeology, ethnography, history, museum objects and collections, cultural landscapes, and historic and prehistoric structures, other permit procedures will apply pursuant to applicable regulations. Permits from other agencies besides the core-managing partners may be recognized, subject to notification and consultation with these agencies.

BLM and its core-managing partners will approve or deny a research/monitoring permit based on an evaluation of favorable and unfavorable factors and on an assessment of perceived risks and benefits. BLM and its core-managing partners will develop and finalize a set of criteria to be applied when considering research permits. BLM and its core-managing partners will consider multiple factors in approving or denying research at the CCNM. Although BLM staff will work with applicants to arrive at a mutually acceptable research design, for some activities, no acceptable mitigating measures may be possible; and the application may be denied. Where specific criteria for approval have not been developed, decisions to issue research permits on monument lands will be made on a case-by-case basis. Preliminary criteria for approval of research proposals are given below under AU-RSR-1.

BLM will require the submittal of specific information with research proposals. This information will include, but will not be limited to the following:

- Power equipment or potentially hazardous materials to be used;
- Numbers of staff entering the CCNM;
- Duration and frequency of field visits;
- Degree of staff intrusion and conformance with seasonal and other closures due to presence of species of concern;
- Proposed flagging, marking of survey stations, and other intrusions; and
- Description of actions to minimize effects on visitors, wildlife, and ecosystems (e.g., food storage and trash storage).

Allowable Uses

AU-RSR-1 **Research/Monitoring Permit Evaluation Criteria.** The following criteria will be used to evaluate research proposals on an interim basis while final criteria are in development.

The suitability of proposed research will increase when the following conditions are met:

- The research addresses missing or incomplete data regarding the CCNM's resources and the uses of those resources.
- The information is useful to an increased understanding of the CCNM's resources and thereby contributes to effective management and/or interpretation of resources.
- The collected information, including manuscripts, publications, maps, and databases, will be shared with CCNM managers.
- Problems or questions posed by the research are of importance to science or society and show promise of making an important contribution to knowledge of the subject matter.
- A principal investigator and support team with a record of accomplishment in the proposed field of investigation have demonstrated their ability to work cooperatively and safely and to accomplish the desired tasks within a reasonable time frame.

- The investigators prepare occasional summaries of findings for public use, such as seminars and brochures.
- Natural and cultural resources, operations, and visitors are not disrupted.
- The safety of researchers and others is not compromised.
- Cataloging and care of collected specimens are planned.
- Details about provisions for meeting logistical needs are provided.
- The research is supported academically and financially.
- All field work, analyses, and reporting will be completed within a reasonable time frame.

The suitability of proposed research will diminish under the following conditions:

- Activities will adversely affect the experiences of visitors to the monument.
- Activities may directly or indirectly adversely affect seabird or pinniped colonies during the nesting/pupping or rearing seasons.
- The potential exists for an adverse effect on natural, cultural, or scenic resources—particularly on nonrenewable resources such as archaeological and fossil sites or geologic formations.
- The research conflicts with any nearby military activities.
- The research is redundant to previous research conducted in the CCNM or in other similar ecosystems (unless designed to corroborate studies in other areas).
- The potential exists for creating a risk of hazard to the researchers, visitors, or ecosystem integrity.
- Extensive collecting of natural materials is planned or unnecessarily replicates existing voucher collections.
- Substantial logistical, administrative, curatorial, or project monitoring support by BLM staff is required.
- Time is insufficient to allow necessary review and consultation.
- The principal investigator lacks scientific institutional affiliation or recognized experience in conducting scientific research.
- Scientific detail and justification are inadequate to support achieving the study objectives.

AU-RSR-2 **Core-Managing Partner Activities.** BLM may authorize partner staff to carry out official duties without requiring a permit. BLM and partner staff will need to comply with professional standards and conditions normally associated with scientific research/monitoring permits issued by BLM.

Operating Framework

FR-RSR-1 **Resource Characterization.** No comprehensive inventory has been conducted to determine the extent and status of many CCNM resources. The data gaps that exist for the coastal rocks and islands make identifying management goals and strategies difficult. To improve this situation, BLM will seek the partnerships and funding needed to undertake detailed characterizations of monument resources. The goal of resource characterization efforts will be to provide the information on resource distribution, condition, sensitivity, threats, and trends that will allow managers to focus their efforts to the greatest benefit of resource conservation.

FR-RSR-2 **Research Coordination.** The Presidential Proclamation emphasizes that the CCNM offers irreplaceable scientific values. Indeed, the monument serves as a platform for a wide variety of scientific research throughout the entire California coast. Entities conducting research along the coast are summarized in Table 2-2.

BLM intends to take an active role in promoting and coordinating research along the entire California coast, especially as it relates to a better understanding of the coastal resources under its stewardship and their relationship to human activity. In coordination with its core-managing partners, BLM will attempt to focus the research to achieve these ends through its permitting process. Specific focus will be placed on the ways in which research can contribute to the resource characterization efforts identified in FR-RSR-1, and to the understanding of human activity effects on coastal resources.

BLM will promote sharing research information to prevent unnecessary overlap of data collection. Information sharing programs such as NOAA's SIMoN (the Sanctuary Integrated Monitoring Program) may be used as models for coordinating research throughout the coast.

Potential research collaborators include California's ten primary marine laboratories, six marine aquariums, and seven maritime museums—as well as various federal and state agencies, non-profit organizations, and research collaborations (e.g., PISCO and Multi-Agency Rocky Intertidal Network [MARINe]). (For a more complete list, please refer to Table 2-3 in Section 2.3.2, "Key Aspects of the Management Approach—Partnerships [Collaboration Focus]" below.)

Land Tenure Adjustments

Objectives

OJ-LTA-1 Pursue acquisition of rocks and islands within the monument corridor that are currently held outside BLM jurisdiction but are made available for transfer or acquisition, where those rocks and islands support the resources for which the monument was established.

Table 2-2. Organizations Conducting Research along the California Coast

Institution
College/University Institutions
Scripps Institution of Oceanography (University of California [UC] San Diego)
Hancock Institute for Marine Studies (University of Southern California)
Southern California Marine Institute (Occidental College, University of Southern California, and multiple campuses of California State University[CSU])
Marine Science Center (UCLA)
Moss Landing Marine Laboratories (consortium of seven CSU campuses)
Hopkins Marine Station (Stanford)
Santa Barbara Marine Science Institute (UC Santa Barbara)
Bodega Bay Marine Lab (UC Davis and UC Berkeley)
Long Marine Lab (UC Santa Cruz)
Telonicher Marine Laboratory (Humboldt State University)
Romberg Tiburon Centers (San Francisco State University)
Government Agencies
State Water Resources Control Board
California Department of Fish and Game (including the California Department of Fish and Game Office of Oil Spill Prevention and Response)
U.S. Department of Defense – Air Force
U.S. Department of Defense – Navy
U.S. Fish and Wildlife Service
U.S. Geological Survey
U.S. Minerals Management Service
National Oceanic and Atmospheric Administration
Beach Erosion Authority for Clean Oceans and Nourishment
California Oceans Resource Management Program (California Resources Agency)
National Marine Sanctuaries
Monterey Bay National Marine Sanctuary
Gulf of the Farallones National Marine Sanctuary
Cordell Banks National Marine Sanctuary
Channel Islands National Marine Sanctuary
Museums and Aquariums
Santa Barbara Maritime Museum
National Maritime Museum (San Francisco)
San Diego Maritime Museum
Los Angeles Maritime Museum
Ventura County Maritime Museum
Maritime Museum of Monterey
Humboldt Bay Maritime Museum (Eureka)
Monterey Bay Aquarium
Cabrillo Marine Aquarium (San Pedro)

Table 2-2. Organizations Conducting Research along the California Coast (continued)

Institution
Museums and Aquariums (continued)
Stephen Birch Aquarium, Scripps Institution of Oceanography (La Jolla)
Steinhart Aquarium, California Academy of Science (San Francisco)
Aquarium of the Pacific (Long Beach)
Sea World, San Diego
Ocean Institute (Dana Point)
Other Organizations and Programs (including nonprofits)
Pt. Reyes Bird Observatory Conservation Science
Ocean Conservancy
Pacific Seabird Group
The Otter Project, Inc.
Save Our Shores
Surfrider Foundation
California Coastal Coalition
California Sea Grant
Partnership for Interdisciplinary Studies of Coastal Oceans (PISCO)
Communication Partnership for Science and the Sea (COMPASS)
Southern California Coastal Water Research Project
Center for Integrated Coastal Observation, Research and Education (CI-CORE)
Coastal Ocean Currents Monitoring Program
Multi-Agency Rocky Intertidal Network (MARINe)

Management Actions

MA-LTA-1 **Disposal.** No monument lands are identified for disposal under this RMP.

MA-LTA-2 **Exchange.** Exchange will be considered where it will further the resource protection purposes of the CCNM and meets the criteria discussed below.

MA-LTA-3 **Acquisition.** Acquisition of additional properties will be considered where it will further the resource protection purposes of the CCNM and meets the criteria discussed below. During the plan implementation, preliminary lists of possible acquisitions will be reviewed and prioritized in cooperation with other resource management agencies along the coast.

MA-LTA-4 **Decision Criteria.** Land tenure adjustments will be considered on a case-by-case basis, using criteria that will include, but not be limited to, the following:

- Value or significance of biological, cultural, and geologic resources;
- Threat level to the resources;
- Opportunity;
- Cost/funding availability; and
- Participation of partnering entities.

Operating Framework

FR-LTA-1 **Approach.** Land tenure decisions will be made consistent with Section 205 of FLPMA. Land acquisition and exchange actions will be performed consistent with federal statutes, regulations, and directives and with willing private or government parties.

FR-LTA-2 **Presidential Proclamation.** The Presidential Proclamation permits acquisition or exchange of private property and other lands to further protect the resources for which the monument was designated. Acquired lands will become part of the CCNM and will be subject to the decisions in this RMP.

Lands may come under BLM administration within the monument coastal corridor established in the Presidential Proclamation through exchange, donation, purchase, revocation of withdrawals of other federal agencies, or relinquishment of existing leases. Newly acquired or administered lands, or interest in lands, will be managed for their highest potential—or for the purposes for which they are acquired. Lands acquired with no identified special values or management goals will be managed in the same manner as surrounding or compatible monument land.

Land Use Authorizations

Objectives

OJ-LUA-1 Authorize rights-of-way, land use permits, and easements on the monument consistent with protection of the monument resources and public health and safety.

Management Actions

MA-LUA-1 **Consideration of Applications.** Each application for use of CCNM lands will be considered on a case-by-case basis, considering the potential for the use to affect CCNM resources and the consistency of the use with the goals and policies of this RMP.

MA-LUA-2 **Provisions for Facility Construction.** Any facilities to be constructed will be built to applicable standards. BMPs and other measures will be implemented to avoid adverse effects on natural resources and the human environment. Any new facilities with potential for adverse effects will be subject to additional environmental review under NEPA.

Allowable Uses

AU-LUA-1 **General.** Uses of the monument will be allowed consistent with proclamation goals and public safety concerns. The descriptions below further elaborate on allowed and prohibited uses.

AU-LUA-2 **Allowed Uses.** The following uses will be allowed on the monument:

- Valid existing rights.
- Emergency uses of the CCNM, such as response to oil spills or hazardous materials releases (including staging for cleanup operations). Expedited approval will be implemented in these events, with provisions included for protection of CCNM resources during operations.
- Filming, if the activity complies with plan provisions. Permits for commercial filming will be required, and the preparation of a NEPA document may be required.
- Special events, if the event meets plan provisions. Permits will be required.
- Other land uses, such as construction and maintenance of aids-to-navigation and communication facilities, subject to BLM approval (also see "Visual Resources—Allowable Uses"). These land uses will require a land use or encroachment permit or right-of-way.

AU-LUA-3 **Prohibited Uses.** The following uses will not be allowed on the monument:

- All forms of entry, location, selection, sale, leasing, or other disposition under the public land laws, including but not limited to withdrawal from location, entry, and patent under the mining laws; and from disposition under all laws relating to mineral and geothermal leasing—other than by exchange that furthers the protective purposes of the monument. This includes coal, oil shale, fluid mineral (including oil and gas, tar sands, geothermal resources, and coal bed methane), locatable mineral, mineral material, and nonenergy leasable mineral exploration and extraction.
- Forest resource extraction.

- Livestock grazing.
- Appropriation, injury, destruction, or removal of any feature of this monument. Exceptions could include those authorized by permit in association with authorized research or management activities, collection of small amounts of seaweed and invertebrates for personal, non-commercial use, and collection of certain natural materials by Native American indians under BLM permit. Exceptions will be allowed only when not in violation of the California Code of Regulations and other federal and state restrictions, or for emergency or management purposes.

Operating Framework

FR-LUA-1 **Granting Land Use Authorizations.** BLM will grant land use authorizations in coordination with core-managing partners, per the MOU, and following standard agency operating procedures. Core partners will coordinate to develop a combined process for authorization of activities that occur on the CCNM as well as activities that span multiple jurisdictional boundaries.

Special Management

Special management includes ACECs, back-country byways, national recreation areas, national trails, and lands recognized as having wilderness characteristics.

Objectives

OJ-SMA-1 Maintain special designations on the monument consistent with protection of the monument resources.

OJ-SMA-2 Maintain the existing wilderness characteristics associated with the rocks, islands, exposed reefs, and pinnacles so long as they are consistent with the overall management objectives of the CCNM.

Management Actions

MA-SMA-1 **California Coastal ACEC.** After careful evaluation of the resources recognized by the 1990 designation of the California Islands Wildlife Sanctuary as an ACEC, it was determined that their protection would be enhanced by maintaining the ACEC designation. The name of the California Islands Wildlife Sanctuary ACEC will be changed to the California Coastal ACEC, and the ACEC designation will be maintained.

MA-SMA-2 **Other Designations.** Other special designations may occur in the future as warranted, following standard BLM procedures.

MA-SMA-3 **Wilderness Characteristics.** The monument will be managed to protect its wilderness characteristics. Appendix F provides the management direction for protecting these wilderness characteristics. The management prescriptions to protect wilderness character are consistent with the direction found in the Presidential Proclamation designating the CCNM.

Cadastral Support

Objectives

OJ-CAD-1 Conduct cadastral surveys in support of new land exchanges or other changes in ownership.

Management Actions

MA-CAD-1 **Clarification of Ownership.** BLM will continue efforts to clarify land ownership where ownership is unknown, believed to be inaccurate, or in dispute.

MA-CAD-2 **Changes in Ownership.** Changes in land ownership status of rocks and islands under CCNM jurisdiction will be documented through surveying so that the geographic extent of land use decisions in this plan is clearly understood.

MA-CAD-3 **Survey Strategy.** A survey strategy will be developed to guide cadastral work for the CCNM. Priority areas for surveying and mapping will be developed, and a time frame for completion will be specified.

Operating Framework

FR-CAD-1 **Approach.** Many small rocks and islands under BLM jurisdiction along California's coast are not fully recorded and mapped. In some areas, jurisdiction between various federal, state, and local entities overlaps and land ownership is in question. Resolving these jurisdictional uncertainties will be a long-term goal of BLM, as it will help to improve long-term management of coastal resources.

2.3 Management Framework

Typically, an action for which an RMP is prepared involves two levels of management: a level that is represented by the detailed areas of allocation and management actions, and a second level that forms an overarching umbrella of management for the proposed action. This overarching level is described in this section. The following discussion describes the elements constituting this level of management and represents the basic operating procedures for the monument.

2.3.1 Presidential Proclamation Management Directives

President Clinton's Proclamation establishing the CCNM (Appendix A) provides the basic framework for management of the monument. The Presidential Proclamation directs that the Secretary of the Interior manage the CCNM through BLM, pursuant to applicable legal authorities, to implement the purposes of the proclamation. The central purpose is clearly stated as protection of the monument's physical, biological, and socio-cultural resources and values. The Presidential Proclamation does not revoke any existing withdrawal, reservation, or appropriation of BLM lands along California's coast; however, the CCNM is identified as the dominant reservation of these lands. Finally, the Presidential Proclamation does not enlarge or diminish the jurisdiction or authority of the State of California or the United States over submerged or other lands within the territorial waters off the coast of California. The Presidential Proclamation, while not specifying management, does establish the context within which the specific management for the monument will be defined.

2.3.2 Key Aspects of the Management Approach

To carry out the mission and accomplish the overall vision for the CCNM, attention will be paid to four equally important aspects of the management approach—preservation, landscape, partnerships, and communities. Figure 2-1 summarizes the key aspects and focus of the management approach to the CCNM.

Preservation (Management Focus)

Preservation is the primary management focus for the CCNM. This focus applies directly to the more than 20,000 rocks and small islands that make up the CCNM (i.e., the portion above mean high tide). Four major elements constitute this management focus: protection, research, education, and planning. These elements and their interrelationships are described below.

Protection

As stated earlier, the primary focus of the CCNM is the protection of rocks and islands, and their geologic, biological, and cultural resources and related values as identified in the Presidential Proclamation. For this reason, other management priorities as established by BLM's multiple-use mandate under FLPMA have been determined to be secondary to this purpose.

Research

Research and scientific monitoring are critical elements in management of the CCNM, as they are the first steps to more clearly understanding the significance and extent of the resources that the CCNM is intended to protect. Agencies, public interest groups, and coastal researchers have emphasized the importance of the research aspect of CCNM management and have indicated interest in being actively involved in covering the gaps in the understanding of coastal resources and resource issues. Encouraging and coordinating research related to the coast and ocean interface (i.e., the "sea-land connection") will be a key aspect of implementing the CCNM RMP. Coordination with the collaborative partners listed under "Partnerships" will help to develop long-term monitoring strategies that are compatible with existing databases and that encourage better understanding of the coastal ecosystems.

Education

Education and associated public outreach form an important element around which effective management of the CCNM has been developed. The first task of this element is the continual effort to increase awareness of the CCNM, including what it is and what it is not. A second task of this element is linking CCNM education efforts with the numerous education initiatives that already exist regarding the various coastal and marine resources of California. The third task is to take advantage of existing and future partnerships and infrastructure, as well as cost-sharing opportunities, to provide for cost-effective interpretation of CCNM resources.

Planning

Implementation of the RMP will involve development of additional, much more specific activity plans. A major challenge to implementing these plans will be coordinating with the wide range of other agencies whose jurisdictions overlap or are adjacent to the lands of the CCNM. With 15 general land use plans for the California coastal counties, over two dozen local coastal programs, various State Park general plans, the marine protected areas anticipated to be derived from the MLPA process, four National Marine Sanctuary plans, and numerous other plans affecting activities along the California coast, simply coordinating with these plans and planning initiatives will result in a substantial workload. BLM and its core-managing partners are dedicated to making the coordination of coastal plans a part of their CCNM management approach.

Landscape (Ecosystem Focus)

Landscape is the ecosystem focus of the second management aspect of the CCNM. It is the more than 14,600 square nautical miles within which the CCNM is located (i.e., from the mean high tide line out 12 nautical miles along the 1,100 miles of the California coastline). As stated in the Presidential Proclamation, the CCNM contains "irreplaceable scientific values vital to protecting the fragile ecosystems of the California coastline." It is the landscape aspect that connects the CCNM with the various ecosystems of which its rocks and small islands are an important part, and links the CCNM with the many jurisdictions and management responsibilities that together ensure the proper management and long-term protection of the California coastal and marine resources and values. This landscape also links the CCNM with its current and future partners, as well as with the public. In addition, it is this landscape that provides the opportunity for using the CCNM as a focal point for the sea-land connection that can help link coastal initiatives with marine initiatives.

To provide a complete ecological perspective to the landscape aspect of the CCNM and effectively manage the monument, all three of the basic dimensions of an ecosystem—physical, biological, and socio-cultural—need to be taken into account. Working to understand the interconnectedness of all three of these dimensions and to continue to apply the growing knowledge of this interconnection will be a key aspect to successfully managing the CCNM. Anything within the landscape can be placed within one of these three ecosystem dimensions. Each of these ecosystem dimensions (based on P. N. Manley et al. 1995) is briefly discussed in the following text.

Physical (Abiotic)

The physical dimension is made up of all of the non-organic, abiotic elements of an ecosystem. This consists of the non-living material components of the environment, such as rocks, water, and air; and can include the topography, geology, climate, nutrients, and hydrology.

Biological (Biotic)

The biological dimension is made up of all the living or biotic elements of an ecosystem. This includes all plants and animals, and involves food webs, microbes, and diseases.

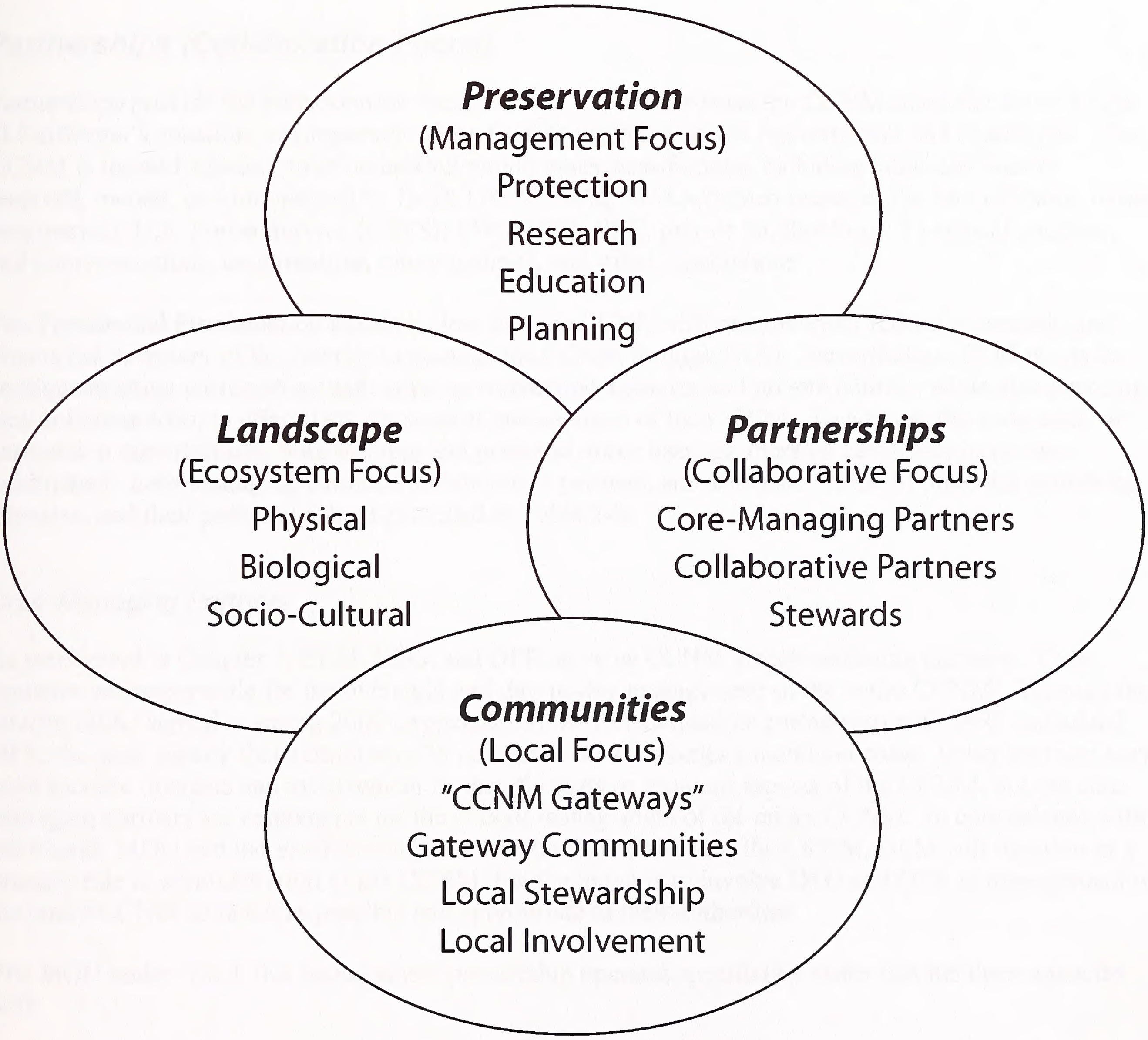
Preservation
(Management Focus)
Protection
Research
Education
Planning
Landscape
(Ecosystem Focus)
Physical
Biological
Socio-Cultural
Partnerships
(Collaborative Focus)
Core-Managing Partners
Collaborative Partners
Stewards
Communities
(Local Focus)
"CCNM Gateways"
Gateway Communities
Local Stewardship
Local Involvement

Figure 2-1
Major Aspects and Focus of the CCNM

Socio-Cultural (Cultural)

The socio-cultural dimension consists of those elements of an ecosystem dealing with the origin, development, organization, and functioning of human societies and cultures. This includes all human-made modifications of the environment, current and past; and involves land uses, economics, beliefs, life style, and social groups.

Partnerships (Collaboration Focus)

Partnerships provide the collaboration focus for the CCNM. Because the CCNM spans the entire length of California's coastline, management of the CCNM provides unique opportunities and challenges. The CCNM is located adjacent to or embedded within many jurisdictions, including lands and waters reserved, owned, or administered by DoD; USCG; NPS; NOAA (which manages the four offshore marine sanctuaries); U.S. Forest Service (USFS); FWS; DPR; SLC; private landholdings; 15 coastal counties; and numerous cities, communities, municipalities, and tribal jurisdictions.

The Presidential Proclamation makes it clear that the CCNM will remain under federal ownership and directs the Secretary of the Interior to manage the CCNM through BLM. Nevertheless, BLM needs to continue existing partnerships with other governmental agencies and private entities, while also pursuing new collaborations, to effectively implement management of the CCNM. To address the wide array of partnership opportunities, both existing and potential, three basic partnership categories have been established: core-managing partners, collaborative partners, and stewards. A list of potential partnering agencies, and their potential role, is provided in Table 2-3.

Core-Managing Partners

As mentioned in Chapter 1, BLM, DFG, and DPR serve as CCNM's core-managing partners. These agencies are responsible for the oversight and day-to-day management of the entire CCNM. Through the interim MOU signed in spring 2000 (Appendix B), BLM extended its partnership with DFG and added DPR, the state agency that administers 25 percent of the California's mainland coast. Other partners may have specific interests and involvement in specific parts or program aspects of the CCNM, but the core-managing partners are responsible for the overall management of the entire CCNM. In concurrence with the interim MOU and the Presidential Proclamation that established the CCNM, BLM will function in a primary role in administration of the CCNM; but the intent is to involve DFG and DPR in management of the entire CCNM as much as possible and appropriate to their authorities.

The MOU under which this management partnership operates specifically states that the three agencies will:

- Collaborate in management of the CCNM,
- Authorize uses in the CCNM only following consultation among the parties,
- Work as partners in preserving the objects of historic and scientific interest for which the CCNM was established,
- Work on mapping and understanding the resources in the CCNM, and
- Work with the public to explain the values of the CCNM.

All three core-managing partners are resource management agencies with statutory and regulatory authority that allows them to operate within the entire area of the CCNM. Although each of the agencies has its own unique authorities, collectively these three agencies can provide the needed management for the CCNM. BLM does not anticipate adding any other core-managing partners. The involvement of other entities with management of the CCNM will be formalized through the use of the other two partnership categories.

It is anticipated that, as the planning and management for the CCNM moves into the implementation stage, the field-level involvement of and coordination among the core-managing partners—as well as the other CCNM partners—will become progressively more active. Local involvement of the CCNM's partners will be a key to the monument's future success.

Collaborative Partners

Collaborative partners will help to implement particular resource/use program areas throughout the monument. Most of the partnerships related to the CCNM will fall into this category. Collaborative partnerships will be developed with a wide variety of governmental, tribal, and private agencies and entities. These partners have specific interests or responsibilities that, when linked with the CCNM, enhance both the monument's purpose and the mission, goals, and purpose of the collaborative partner. These partnerships will include entities that oversee similar resources (e.g., seabirds or tidepools), have program-related interests (e.g., maritime heritage or marine protected species), are involved in a related activity (e.g., research or education), or oversee adjacent locations (e.g., an area within a National Marine Sanctuary). Collaborations could take the form of joint ventures with multiple participating partners.

When the Draft RMP/Draft EIS was printed, collaborative partnership agreements had been developed with NOAA's MBNMS and PRBO Conservation Science, a non-profit membership organization dedicated to conserving birds and other wildlife and their ecosystems through innovative scientific research and outreach.

Other potential collaborative partners include, but are not limited to: USCG, NOAA National Marine Protected Areas Center, NOAA's NMFS, FWS, NPS, MMS, USGS, DoD, SLC, the California Coastal Conservancy, California Coastal Commission, Santa Barbara Maritime Museum, University of California (UC) Davis Bodega Marine Laboratory, UC San Diego Scripps Institution of Oceanography, California State University Moss Landing Marine Laboratories, Monterey Bay Aquarium, PISCO, Point Arena Lighthouse Keepers, the Ocean Conservancy, the Surfriders Foundation, Save Our Shores, and the Recreational Fishing Alliance).

Stewards

This partnership category is for select entities with ownership and management responsibility for a specific portion of the coast that adjoins part of the CCNM. These partners agree to serve as stewards for that portion of the CCNM. Stewards will work with BLM and other partners to help in management of a portion of the CCNM that is offshore of the steward's onshore property. Examples of potential stewardship partners include Vandenberg AFB (Santa Barbara County), the Town of Trinidad (Humboldt County), Crescent City Harbor District (Del Norte County), the Pebble Beach Company (Monterey County), and possibly some individual private landowners or landowner associations.

A stewardship agreement will be developed with each approved steward. Each agreement will identify the specific portion of the CCNM for which the steward will assist in long-term management, as well as

Table 2-3. Potential and Existing Partnerships for the CCNM

Page 1 of 4

	Education and Interpretation	Inventory and Mapping	Research	Enforcement	Plan Coordination	Land Acquisition	Publicity	Sponsorship[1]
Core Managing Partners								
California Department of Fish and Game (DFG) (Marine Region and Office of Spill Protection and Response)	X	X	X	X	X		X	X
California Department of Parks and Recreation (DPR)	X	X	X	X	X		X	X
Federal Agencies								
U.S. Department of the Interior (DOI):								
National Park Service (NPS)	X	X	X		X		X	
Fish and Wildlife Service (FWS)	X	X	X	X	X		X	
Geological Survey (Biological Services and Coast and Marine Geology Program)		X	X					
Minerals Management Service (MMS)	X	X	X		X			
U.S. Department of Commerce – National Oceanic and Atmospheric Administration (NOAA):								
National Ocean Service	X	X	X		X		X	
Office of Ocean and Coastal Resource Management		X	X		X			
National Marine Sanctuary Program								
Monterey Bay National Marine Sanctuary (MBNMS)	X	X	X	X	X		X	
Gulf of the Farallones National Marine Sanctuary	X	X	X	X	X		X	
Cordell Banks National Marine Sanctuary	X	X	X	X	X		X	
Channel Islands National Marine Sanctuary	X	X	X	X	X		X	
National Marine Fisheries Service (NMFS)	X	X	X	X	X			
National Marine Protected Areas	X	X	X		X		X	
Office of Coastal Mapping		X						
U.S. Department of Homeland Security – Coast Guard (USCG)				X	X	X		
National Science Foundation			X					X
U.S. Department of Defense – Air Force, Navy, Marines, and Army (DoD)			X		X			
U.S. Department of Agriculture – Forest Service (Los Padres National Forest) (USFS)	X	X	X		X	X		

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[1] Sponsorship refers to assistance, with in-kind or monetary.

Table 2-3. Potential and Existing Partnerships for the CCNM (continued) Page 2 of 4

	Education and Interpretation	Inventory and Mapping	Research	Enforcement	Plan Coordination	Land Acquisition	Publicity	Sponsorship[1]
State Agencies								
Resources Agency – California Ocean Resources Management Program		X	X		X		X	
California Coastal Commission		X	X		X		X	
California Coastal Conservancy	X				X		X	
California State Lands Commission (SLC)		X	X		X			
California State Water Resources Control Board		X	X	X	X			
California Regional Water Quality Control Boards		X	X	X	X			
California Department of Forestry and Fire Protection (CDF)		X						
California Department of Transportation (Caltrans)	X	X			X		X	
California Department of Boating and Waterways				X	X			
Local Agencies								
Cities and counties	X	X			X	X	X	
Law enforcement				X				
City and county parks and beaches	X			X	X		X	
Harbor commissions	X				X			
Beach Erosion Authority for Clean Oceans and Nourishment		X	X					
Marine Research Institutions and Laboratories								
Scripps Institution of Oceanography, University of California (UC) San Diego (La Jolla)	X	X	X				X	
Marine Science Institute, UC Santa Barbara (Goleta)	X	X	X				X	
Bodega Marine Laboratory, UC Davis (Bodega Bay)	X	X	X				X	
Institute of Marine Sciences, UC Santa Cruz (including Long Marine Laboratory and Seymour Marine Discovery Center)	X	X	X				X	
Moss Landing Marine Laboratories, The California State University	X	X	X				X	
Humboldt State University Telonicher Marine Laboratory (Trinidad)	X	X	X				X	
Hopkins Marine Station, Stanford University (Pacific Grove)	X	X	X				X	
Catalina Marine Science Center, University of Southern California (Catalina Island)	X	X	X				X	
Monterey Bay Aquarium Research Institute (Moss Landing)	X	X	X				X	
Orange County Marine Institute (Dana Point)	X	X	X				X	
Hancock Institute for Marine Studies (University of Southern California)	X	X	X				X	

Table 2-3. Potential and Existing Partnerships for the CCNM (continued)

	Education and Interpretation	Inventory and Mapping	Research	Enforcement	Plan Coordination	Land Acquisition	Publicity	Sponsorship[1]
Marine Research Institutions and Laboratories (continued)								
Southern California Marine Institute (Occidental College, University of Southern California, and California State University)	X	X	X				X	
Marine Science Center (UCLA)	X	X	X				X	
Hubb-Sea World Marine Laboratory (San Diego)	X	X	X				X	
Romberg Tiburon Center for Environmental Studies (San Francisco State University)	X	X	X				X	
Island Conservation and Ecology Group		X	X				X	
Marine Aquariums								
Monterey Bay Aquarium	X	X	X				X	
Cabrillo Marine Aquarium (San Pedro)	X	X	X				X	
Stephen Birch Aquarium, Scripps (La Jolla)	X	X	X				X	
Steinhart Aquarium, California Academy of Science (San Francisco)	X	X	X				X	
Aquarium of the Pacific (Long Beach)	X	X	X				X	
Sea World, San Diego	X	X	X				X	X
Maritime and Other Museums								
Santa Barbara Maritime Museum	X	X	X				X	
National Maritime Museum, NPS (San Francisco)	X	X	X				X	
San Diego Maritime Museum	X	X	X				X	
Los Angeles Maritime Museum (San Pedro)	X	X	X				X	
Ventura County Maritime Museum (Oxnard)	X	X	X				X	
Maritime Museum of Monterey	X	X	X				X	
Humboldt Bay Maritime Museum (Eureka)	X	X	X				X	
Santa Barbara Museum of Natural History	X	X	X				X	
Other Non-Profit Organizations, Grant-Making Foundations, and Collaborations								
Point Reyes Bird Observatory (PRBO) Conservation Science	X	X	X		X		X	
Ocean Conservancy	X	X	X				X	
Pacific Seabird Group	X	X	X				X	
The Otter Project, Inc.	X	X	X				X	
Save Our Shores	X	X	X	X			X	
Bay Keepers				X			X	
Surfrider Foundation	X	X	X	X			X	

Table 2-3. Potential and Existing Partnerships for the CCNM (continued) Page 4 of 4

	Education and Interpretation	Inventory and Mapping	Research	Enforcement	Plan Coordination	Land Acquisition	Publicity	Sponsorship[1]
Other Non-Profit Organizations, Grant-Making Foundations, and Collaborations (continued)								
Coastwalk								
California Coastal Coalition								
California Sea Grant	X	X	X					X
Partnership for Interdisciplinary Studies of Coastal Oceans (PISCO)	X	X	X				X	
Communication Partnership for Science and the Sea (COMPASS)		X	X				X	
Southern California Coastal Water Research Project		X	X				X	
Center for Integrated Coastal Observation, Research and Education (CI-CORE), The California State University	X	X	X				X	
Coastal Ocean Currents Monitoring Program		X	X					
Recreational Fishing Alliance (RFA)	X						X	
Mendocino Seaweed Stewardship Alliance	X	X					X	
Ocean Laguna Foundation	X	X	X	X			X	
Yurok Tribe	X	X	X					

outline the expected roles and responsibilities of a steward while working with BLM and its various CCNM partners.

Communities (Local Focus)

The final focus on communities has been chosen to help develop community involvement and a sense of community "ownership," which will aid in effectively managing the CCNM. As part of this focus, the establishment and initiation of a series of "CCNM gateways" will be completed. CCNM gateways are sections of the California coast that serve as visitor contact points or portals for the CCNM—areas, towns, cities, communities, or various locations that are ideal for providing visitor information and services—and have the infrastructure and interest in serving in this capacity. CCNM gateways also will be the vehicle to establish a local "flavor" for a specific portion of the CCNM, provide local stewardship, and create a sense of place for the monument. A more detailed discussion of "CCNM Gateways" is provided below under "Key Management Initiatives."

2.3.3 Plan Implementation Priorities

Key Priorities for Management

The following three priorities for management of the CCNM have been identified:

- **Protecting CCNM Resources and Resource Values.** Although the CCNM manager has the overall responsibility of overseeing the management of the entire monument, the five BLM coastal field office (i.e., Arcata, Ukiah, Hollister, Bakersfield, and Palm Springs/South Coast) managers have the day-to-day responsibility carrying out the resource protection of their respective portions of the CCNM. In addition, assistance in protection will be provided from BLM's core-managing partners, DFG and DPR, as well as from some of the CCNM's other partners (e.g., the "stewards").
- **Developing and Maintaining Partnerships.** With a national monument that is as extensive as the CCNM, as well as being connected to so many varied jurisdictions, the opportunities for partnerships are enormous; and such partnerships are necessary. BLM needs to continue existing CCNM partnerships and establish new ones with other governmental agencies and other entities in order to effectively administer the CCNM. This effort will help support and be linked with all other aspects of CCNM management.
- **CCNM Site Characterization.** A comprehensive site characterization will be critical to identifying the resources that comprise the CCNM as well as the important locations, resources, and values that the monument aims to protect. It also will enable BLM to organize research and monitoring needs, gaps, and opportunities; discuss the CCNM in terms of its physical, biological, and socio-cultural demensions; begin developing the CCNM's public education and interpretive initiatives; and establish a public accessible web-based site.

Key Management Initiatives

BLM has identified a number of topics that could serve as focal points for its initial management efforts on the CCNM. These topics include scenic values, the sea-land connection, geologic formations, seabirds (including coastal, offshore, or pelagic birds and their associated habitats), marine mammals (pinnipeds and sea otters and their associated habitats), intertidal vegetation, terrestrial vegetation, special-status species, invasive species, the nearshore ocean zone, tidepools, lighthouses, historic and prehistoric use, shipwrecks, paleontogical values, CCNM Gateways, and the virtual monument.

Of these topics, three have been selected for immediate attention to ensure that the RMP implementation contains specific actions that begin to produce visible results: (1) CCNM Gateways, (2) Seabird Conservation, and (3) Tidepool Connections. Although initial management may not focus exclusively on these three areas, they represent the initial priorities and will override other potential initiatives until additional funding and staffing becomes available for CCNM management. The CCNM gateway initiative is critical to providing a sense of place to the CCNM and involving the local communities, our partners, and five BLM coastal field offices. Seabird conservation initiates the research aspect of the CCNM. Finally, the tidepools initiative provides an education and outreach focus area needing attention, and will provide the vehicle to connect with all of the current CCNM partners—along with a tangible goal and purpose that will connect the CCNM with a large number of other potential partners (i.e., a "tidepool network").

Each of these three initiatives is described in more detail below. In addition, the descriptions of the management actions in Section 2.3 contain additional information about CCNM management that is relevant to the three initiatives.

CCNM Gateways

CCNM visitor gateways will be located at various points along the California coast; they are intended to provide a sense of place for this unique monument, bring the monument into focus, and link the CCNM with local communities and initiatives. Of the CCNM's 36 sub-units (described in more detail below under "Sub-Unit Identification"), 12 lend themselves to serve as the initial CCNM gateways and provide the primary contact locations for the CCNM. These 12 potential CCNM gateways are (from north to south) the following: (1) Crescent City, (2) Trinidad, (3) Shelter Cove (Lost Coast), (4) Mendocino (Fort Bragg/Mendocino), (5) Elk, (6) Point Arena, (7) Sonoma Coast, (8) Pigeon Point (San Mateo/Santa Cruz Coast), (9) Monterey Peninsula, (10) Big Sur, (11) Piedras Blancas/San Simeon (San Luis Obispo north), and (12) Palos Verdes Peninsula. These locations provide multiple opportunities with a variety of partners and potential partners to serve as the CCNM's key contact points. As an important part of the implementation of this key aspect of the long-term management of the CCNM, three to five CCNM gateways could be rolled-out per year over the first 3–5 years of implementing the CCNM RMP.

The first five priority CCNM Gateways include one in each of the five BLM coastal field offices. A proposed implementation schedule is as follows:

2006	Piedras Blancas/San Simeon (Bakersfield Field Office [FO]), Point Arena (Ukiah FO), Pigeon Point (Hollister FO), Lost Coast/Shelter Cove (Arcata FO), and Palos Verdes Peninsula (Palm Spring/South Coast FO)
2007	Monterey Peninsula (Hollister FO), Elk (Ukiah FO), Trinidad (Arcata FO), and Sonoma Coast (Ukiah FO)
2008	Big Sur (Hollister FO), Mendocino (Ukiah FO), and Crescent City (Arcata FO)

For each CCNM gateway, the following steps will be completed: (1) identification and initiation of the key local partnerships; (2) development of an implementation and marketing plan; (3) identification, enhancement, and/or development of the initial infrastructure for interpretation and visitor contact;

(4) development of visitor contact information and media packets; (5) planning and carrying out a roll-out ceremony; and (6) implementation.

Seabird Conservation

Seabirds, shorebirds, and pinnipeds are the most prominent wildlife on the CCNM. Of these, seabirds have received the least attention. As used here, seabirds are those species—whether coastal, offshore, or pelagic—whose normal habitat and food source is the sea. This term includes species (e.g., pelicans) for which, at certain times of the year, the sea provides their habitat and principal source of food (Harrison 1983). For the CCNM, these species include, but are not necessarily limited to, Leach's storm-petrel, ashy storm-petrel, black storm-petrel, fork-tailed storm-petrel, brown pelican, pelagic cormorant, Brandt's cormorant, common murre, pigeon guillemot, Xantus's murrelet, Cassin's auklet, rhinoceros auklet, tufted puffin, and western gull.

While seabird research has increased significantly over the past 40 years, information is limited. Research has significantly increased knowledge about some species (e.g., common murre and Brandt's cormorant), but little is known about such things as the pelagic dispersal and the breeding areas for some of these species.

The most recently available inventory of seabirds on the islands and rocks of California was compiled in 1980 (Sowls et al.), although data gathered in the early 1990s by Harry Carter and others may be available sometime in 2005 (Carter pers. comm.). These surveys, while comprehensive, are critically in need of updating. Populations of some of the larger seabirds (e.g., common murre and Brandt's cormorant) have been surveyed from the air, but many small breeding populations of seabirds have not been surveyed since the 1970s (Manuwal et al. 2001). There is very little information on the status of most of the seabird colonies in the CCNM. This is especially true for nocturnal and burrow- or crevice-nesting seabirds, for which the above inventories were not designed to survey, and for the smallest colonies. Future surveys likely will document more nesting sites than previously recorded because new technology now enables surveyors to better detect some of the more secretive birds (e.g., storm-petrels and small auklets) that are active mostly at night. As more is known about seabirds, conservation efforts can be developed and implemented that will help to ensure the survival of these species.

Because the rocks and small islands of the CCNM provide important habitat to seabirds for roosting, resting, nesting, breeding, and brooding, the CCNM can help to fill the gaps in the seabird inventories along the California coast and can serve as a focal point for seabird conservation initiatives. This could include working with various CCNM partners to coordinate seabird monitoring, research, protection, and public outreach initiatives.

Tidepool Connections

With more than 20,000 offshore rocks and small islands spread along the 1,100 miles of the California coastline, the monument is associated with much of the state's rocky intertidal coastal zone. Therefore, the monument is connected with many of California's unique tidepool areas. Although tidepools exist primarily below mean high tide and are therefore outside the CCNM, some of the pools' features extend above mean high tide and are part of the monument. This linkage demonstrates the interconnecting relationship the CCNM has with the various coastal ecosystems of which it is a part.

Tidepools are pools left behind when the ocean water recedes at low tides. Because some parts of the beach and some rocks are higher than others, the water reaches some parts of them during high tides but not other parts, and some parts may be below the water except during minus tides. This creates four "intertidal zones" of the beaches and rocks that are affected by the water in different ways. These four zones are the splash zone, high tide zone, middle tide zone, and low tide zone.

Depending on whether the tidepools are in a sheltered or exposed part of the intertidal zone, the amount of intertidal area within the monument will vary considerably. In sheltered areas, the CCNM area (i.e., above mean high tide) may include only the uppermost portion of the high tide zone and the splash zone above it. In exposed areas, the CCNM area may include the entire portion of the high tide zone and even part of the middle tide zone. In exposed coastal areas, the intertidal zones tend to spread wider and higher due to heavier wave action (Ricketts et al. 1985).

Connection with a wide variety of California's tidepools provides the CCNM with the opportunity to serve as the vehicle to help develop and coordinate a California coast-wide initiative related to tidepool education and protection. This may include development and dissemination of a "tidepool etiquette" applicable to the entire coast, common tidepool public education materials, and appropriate signage wording and formats; and establishing a communication network.

CCNM rocks are associated with many of California's best tidepool areas, including Trinidad State Beach and the King Range National Conservation Area in Humboldt County, MacKerricher State Park in Mendocino County, Sea Ranch's Shell Beach in Sonoma County, Fitzgerald Marine Reserve in San Mateo County, Point Pinos in Monterey County, Leo Carrillo State Beach and Rancho Palos Verdes' Abalone Cove Ecological Reserve in Los Angeles County, and La Jolla Cove in San Diego County.

2.3.4 General Management Guidance

Monument Administration

BLM will use its existing operating procedures and guidance documents, and its MOU with DFG and DPR (Appendix B) as a base to administer the CCNM. Administration by BLM is currently performed through the CCNM Manager, stationed in Monterey, California, and working under the Deputy State Director, Natural Resources in the BLM's California State Office in Sacramento. The CCNM Manager works closely with the managers of the five California BLM field offices with coastal responsibilities (i.e., the Arcata, Ukiah, Hollister, Bakersfield, and Palm Springs/South Coast FOs). These field office managers have the day-to-day operational responsibilities related to their respective portion of the CCNM. The CCNM Manager has support from various BLM staff members from the five BLM coastal field offices, as well as from BLM California State Office staff members for a variety of resource and administrative functions.

The interim MOU for the core-managing partners identifies that DFG and DPR will work as partners with BLM in preserving monument resources identified in the Presidential Proclamation, as well as mapping, evaluating, and communicating with the public regarding these resources. The MOU also requires consultation between the agencies before authorizing uses of the CCNM. To this extent, DFG and DPR also will participate in monument administration. In concordance with the Presidential Proclamation and the MOU, BLM will function in a primary role in monument administration.

Role and Responsibilities of Core-Managing Partners

As mentioned above, BLM has ultimate responsibility for the CCNM and its management. As such, it will serve as the final decision-making authority for actions on the monument, with consultation on major decisions to be conducted with DFG and DPR. DFG and DPR, while being involved in all aspects of CCNM management, will take more significant roles for managing individual elements of the CCNM as dictated by their respective agency missions and areas of expertise, at a level commensurate with available funding. To this end, DFG will provide support for biological resources management actions. DPR will provide significant support for recreation and education/interpretation management actions.

Direct and Indirect Management

The RMP identifies management actions that apply only to the individual rocks and islands of the CCNM. Because the rocks and islands are elements of a larger, closely connected coastal ecosystem, activities in the waters and lands adjacent to the CCNM also have the potential to affect monument resources. Consequently, in addition to describing the management to be carried out within the CCNM, the RMP includes management direction for participation in activities that could indirectly affect CCNM resources. This direction is expressed primarily through recommendations for coordination with other coastal initiatives and programs (e.g., DFG's Office of Spill Prevention and Response [OSPR] program), as well as active participation in mainland education, interpretation, and recreation opportunities.

Specific Management Approaches

Sub-Unit Identification

Due to the sheer geographic spread and the substantial variability in physical, biological, and jurisdictional conditions along the length of California's coast, the CCNM corridor has been subdivided into 36 sub-units. These sub-units were developed as preliminary divisions to facilitate tailored management based on region-specific management issues. The sub-units have been distinguished using a variety of factors, including physiographic variability, presence and absence of CCNM properties, distance relationships between adjacent rock and island groups, and existing management jurisdiction boundaries. Sub-units were developed to serve as the basic unit for planning for the long-term management and use of the CCNM and to allow for distinctions in planning and management approaches, as well as providing the opportunity to create larger sub-units if desired for implementation of RMP actions. These sub-units are shown in Figures 2-2a–c and are described in Table 2-4. While some of the sub-units identified do not contain rocks or islands that are part of the CCNM, they were designated to ensure comprehensive coverage of the entire coastline. The sub-units are considered preliminary; and the number, location, and definitions of these sub-units may be altered in the future through the RMP's adaptive management approach. The results of resource and public use inventories recommended in this plan will play a significant role in future adjustments to management boundaries in the CCNM.

Regionalized Management Approaches and Prototyping

Management of the CCNM is intended to be tailored to coastal location. As discussed above, the CCNM has been divided into sub-units. These sub-units or other logical divisions may be subject to varying management based on the geographic area, density, and character of monument features and associated resources in a given region; the number and engagement of partners; and local community interests and concerns. This site-specific management approach will extend to the implementation actions identified in the plan below—in particular, activities related to protection of CCNM resources and recreational, educational, and interpretative programs. To this end, activity plans and associated implementation activities may address smaller geographic areas than the entire CCNM, such as an individual field office or sub-unit. These "area plans" may also address multiple resources. Regional approaches will be implemented only to the extent that they do not undermine the core purpose of the CCNM (protection of objects of scientific and historic interest) and remain feasible from a management and funding perspective.

BLM intends to use prototyping in its early management actions. Prototyping involves implementation of certain management approaches, particularly those that are relatively untested, on small portions of the coast to determine their usefulness, applicability, and potential for success in other specific areas. Highly successful approaches may be extended to the CCNM as a whole.

Public Role

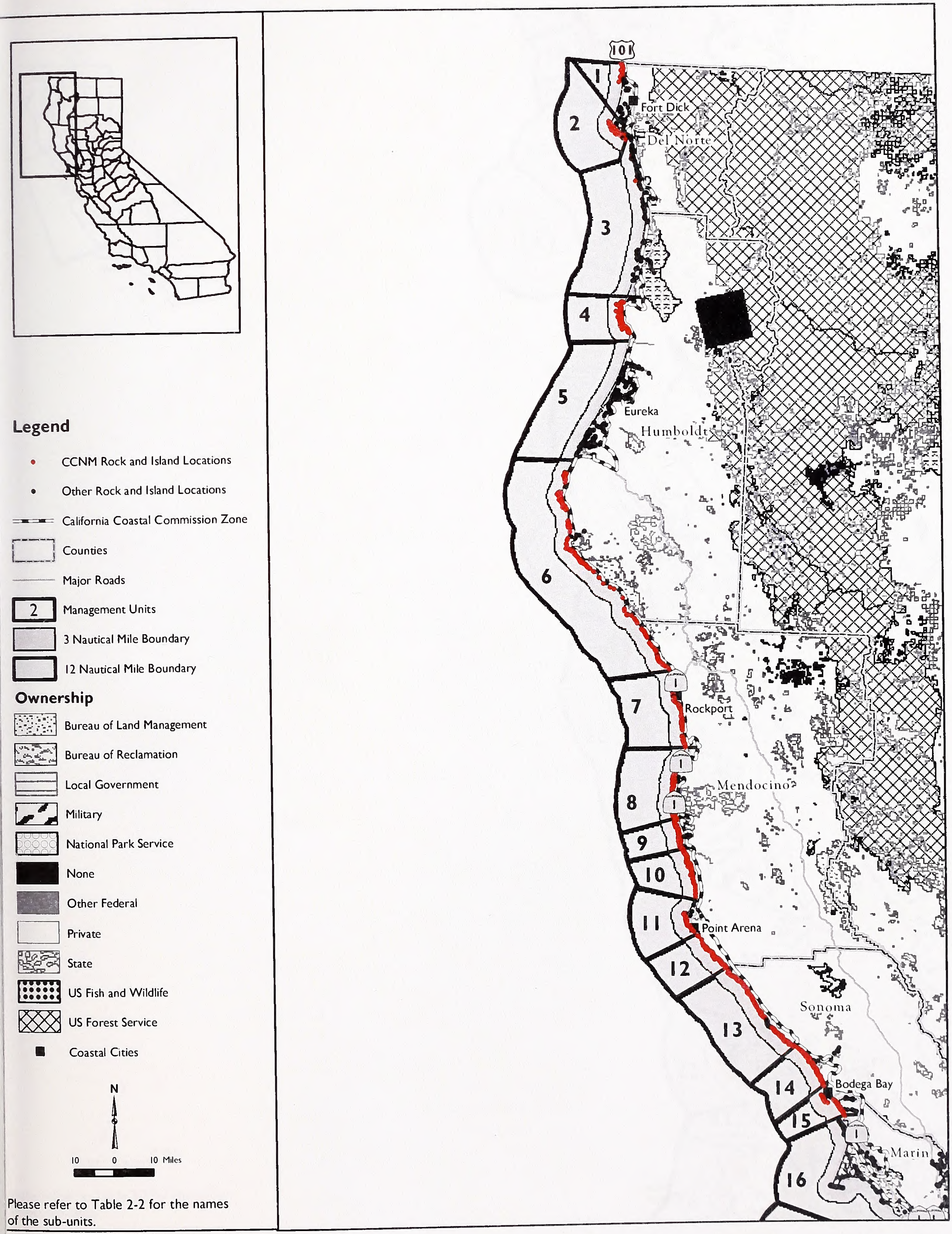
In addition to learning about and appreciating the CCNM, the public has the potential to assist with management of the CCNM and its resources. This assistance may include participating in public advisory groups that will be formed as necessary and appropriate; participating in existing BLM Resource Advisory Committees (RACs); and undertaking management roles as part of specific public or private groups through MOUs, following the partnership approach outlined above. In addition, BLM and its partners will continue to encourage establishment of or partnership with existing public foundations and other public groups for funding, interpretation, and education. The approach for public participation in CCNM management will be developed through implementation planning.

Regulations

As described in Chapter 1, the CCNM is currently managed under a variety of laws and regulations, including regulations that provide for protection of CCNM resources. FLPMA, ESA, MBTA, and MMPA are the principal bases for federal protection. From the state perspective, the California Code of Regulations, Title 14, Section 630 (Appendix C) provides a basis for protection of ecological reserves such as the CCNM. Substantial additional regulation is not considered necessary. In certain cases, however, establishment of duplicative regulation at the federal and state levels may be desirable, as it would provide all three core-managing partners and other enforcing entities equal jurisdiction to enforce regulations. In addition, targeted new regulation may be necessary where existing regulation is not sufficient to ensure adequate protection of CCNM resources. The Approved RMP, when adopted, could identify the possible need for any new regulations that may be required related to specific approved management actions identified.

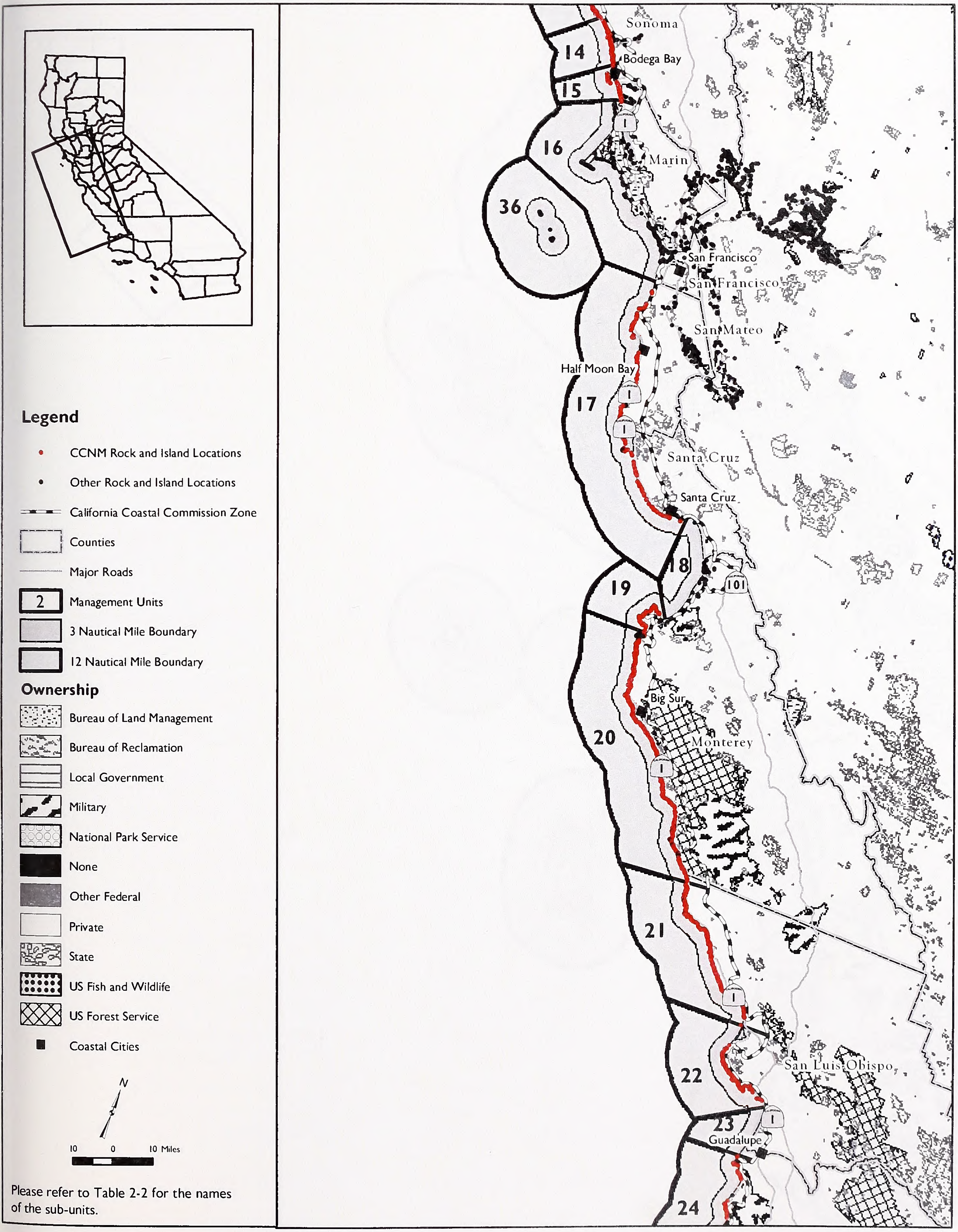
Law Enforcement

Law enforcement efforts on and adjacent to the CCNM will continue under current jurisdictional limits, using existing legal and regulatory authority. This includes enforcement of restrictions contained in the MOU between BLM, DPR, and DFG for management of the CCNM (Appendix B). BLM also intends to use the CCNM management as a vehicle to increase coordination between enforcement agencies, including DFG, NPS, FWS, USCG, NOAA, local law enforcement entities, and others (refer to Table 2-3). The goals of this coordination will be to clarify any existing jurisdictional confusion, improve enforcement of protective laws and regulations, focus enforcement resources on segments of the coast where protection of biological and cultural resources is most needed, and establish MOUs or cooperative


101
1
2
Fort Dick
Del Norte
3
4
5
Eureka
Humboldt
6
7
1
Rockport
1
1
8
Mendocino
9
10
11
Point Arena
12
13
Sonoma
14
Bodega Bay
15
1
Marin
16
Legend
● CCNM Rock and Island Locations
● Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2 Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
■ Coastal Cities
N
10
0
10 Miles

Please refer to Table 2-2 for the names of the sub-units.

Figure 2-2a
CCNM Sub-Units, North Region


Sonoma
14
Bodega Bay
15
16
Marin
36
San Francisco
San Francisco
San Mateo
Half Moon Bay
17
Santa Cruz
Santa Cruz
18
101
19
Big Sur
20
Monterey
21
22
San Luis Obispo
23
Guadalupe
24
1
Legend
● CCNM Rock and Island Locations
● Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2 Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
■ Coastal Cities
N
10
0
10 Miles

Please refer to Table 2-2 for the names of the sub-units.

Figure 2-2b
CCNM Sub-Units, Central Region

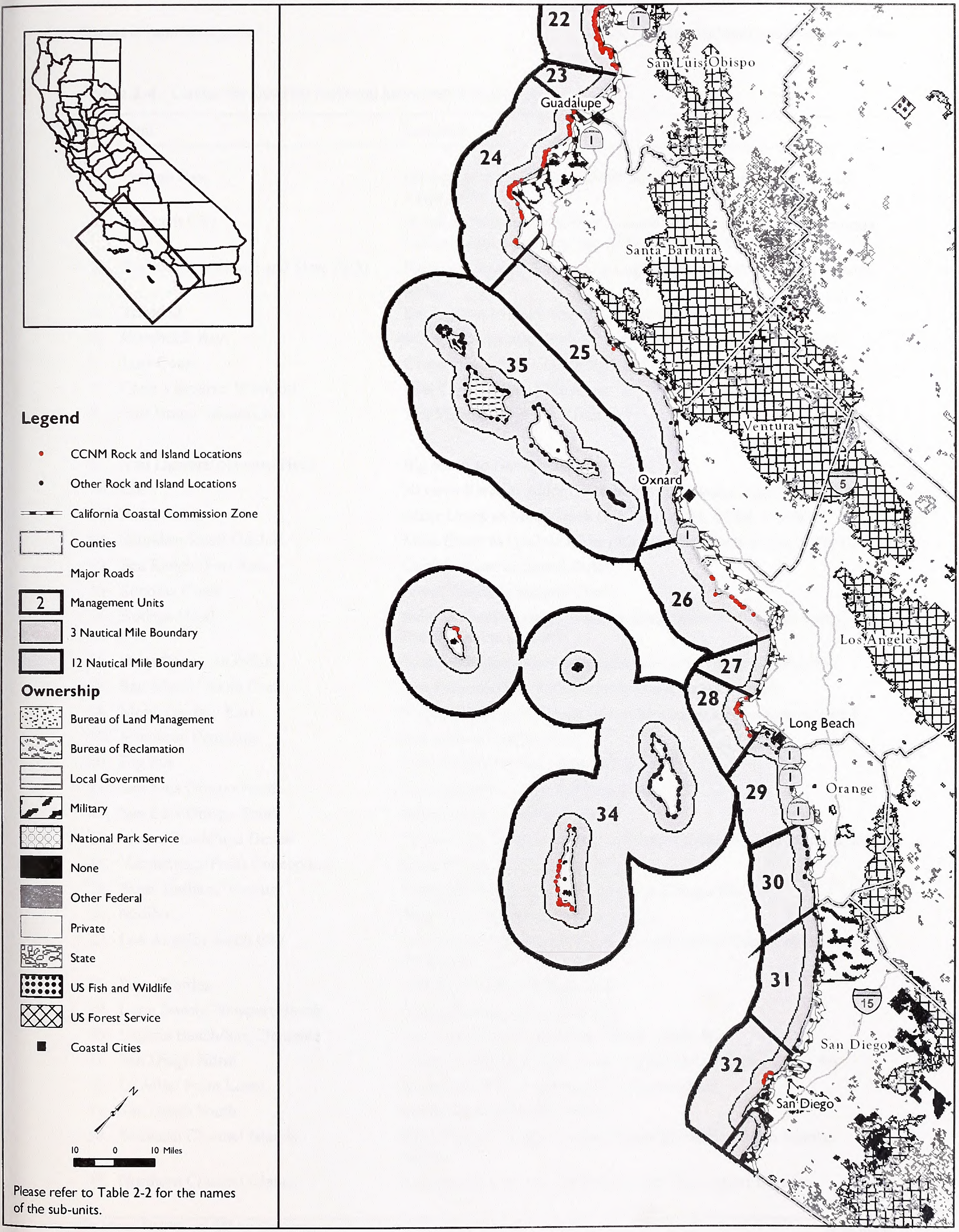

Legend
CCNM Rock and Island Locations
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
10 0 10 Miles
Please refer to Table 2-2 for the names of the sub-units.
22
23
24
25
26
27
28
29
30
31
32
34
35
San Luis Obispo
Guadalupe
Santa Barbara
Ventura
Oxnard
Los Angeles
Long Beach
Orange
San Diego
San Diego
1
5
15

Figure 2-2c
CCNM Sub-Units, South Region

Table 2-4. California Coastal National Monument Sub-Units

Sub-Unit	Location
1. Pelican Bay	Oregon border to north of Point Saint George (top of Section 16, T16N, R2W)
2. Crescent City	North of Point Saint George to south of Crescent City at Redwoods National Park boundary (top of Section 2, T15N, R1W)
3. Redwoods National and State Parks	South of Crescent City to Big Lagoon (north end of Patrick's Point SP)
4. Trinidad	Big Lagoon to south end of Little River SP
5. Humboldt Bay	South end of Little River SP to Centerville Beach County Park
6. Lost Coast	Centerville Beach County Park to Usal Creek
7. Cape Vizcaino/ Westport	Usal Creek to Ten Mile River
8. Fort Bragg/ Mendocino	Ten Mile River to Big River
9. Van Damme/ Navarro Head	Big River to Navarro River
10. Elk	Navarro River to Alder Creek at the north end of Manchester SP
11. Point Arena	Alder Creek to Moat Creek (top Section 30, T12N, R16W)
12. Saunders Reef/ Gualala	Moat Creek to Gualala River (Mendocino/Sonoma county line)
13. Sea Ranch/ Fort Ross	Gualala River to Jewell Gulch
14. Sonoma Coast	Jewell Gulch to Salmon Creek
15. Bodega Head	Salmon Creek to south of Dillon Beach (south of old University of Pacific marine station)
16. Point Reyes/ GGNRA	South of Dillon Beach to San Francisco/San Mateo county line
17. San Mateo/ Santa Cruz	San Francisco/San Mateo county line to Soquel Creek
18. Monterey Bay East	Soquel Creek to El Estero east of Monterey's Fisherman's Wharf
19. Monterey Peninsula	El Estero to Carmel River
20. Big Sur	Carmel River to San Carpoforo Creek
21. San Luis Obispo North	San Carpoforo Creek to Morro Rock
22. San Luis Obispo South	Morro Rock to Pismo Creek
23. Pismo/Guadalupe Dunes	Pismo Creek to Mussel Point (2½ miles south of Santa Maria River)
24. Vandenberg/Point Conception	Mussel Point to Cañada del Cojo
25. Santa Barbara/ Ventura	Cañada del Cojo to Mugu Lagoon and Mugu Rock
26. Malibu	Mugu Rock to Santa Monica Canyon
27. Los Angeles South Bay	Santa Monica to Malaga Cove (at north end of Palos Verdes Peninsula)
28. Palos Verdes	Malaga Cove to San Pedro Bay
29. Long Beach/ Newport Beach	San Pedro Bay to Newport Bay
30. Laguna Beach/San Clemente	Newport Bay to Orange/San Diego county line
31. San Diego North	Orange/San Diego county line to north end of Torrey Pines SB
32. La Jolla/ Point Loma	North end of Torrey Pines SB to North Island
33. San Diego South	North Island to Mexico border
34. Southern Channel Islands	San Clemente, Santa Catalina, Santa Barbara, and San Nicolas Islands
35. Northern Channel Islands	Anacapa, Santa Cruz, Santa Rosa, and San Miguel Islands

Table 2-4. California Coastal National Monument Sub-Units (continued)

Sub-Unit	Location
36. Farallon Islands	Southeast Farallon, Middle Farallon, and North Farallon Islands

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Notes:

GGNRA = Golden Gate National Recreation Area.

SB = State Beach.

agreements as needed to effectively protect the CCNM's resources. This may take the form of a law enforcement workgroup for the CCNM.

Many of the law enforcement issues that exist for CCNM resources are associated with activities that do not take place on the monument itself, such as disturbance of wildlife from mainland activities, water-based recreation, and airplane and helicopter overflights; and emergency response to spills and accidents. While BLM does not regulate or enforce regulations on much of the coastal mainland, in the air, or on the water surrounding the monument, law enforcement staff involved in managing the CCNM will be educated regarding these issues; and enforcement efforts will be coordinated through BLM or BLM partner sponsorship of periodic law enforcement conferences at various locations along the coast.

Important laws and regulations guiding enforcement include the:

- Presidential Proclamation;
- Federal Land Policy and Management Act;
- Endangered Species Act;
- Clean Water Act ;
- Marine Life Protection Act;
- Marine Mammal Protection Act;
- Magnuson-Stevens Fishery Conservation and Management Act;
- Migratory Bird Treaty Act;
- Archeological Resources Protection Act;
- California Code of Regulations, Title 14, Section 630, Ecological Reserves;
- California Endangered Species Act; and
- California Fully Protected Species.

Management Revenue and Expenditures

BLM intends that plan implementation will be fully funded and executed in the most cost-effective manner; and that revenues to support CCNM management will be provided by agency appropriations, grants, donations, and other funding sources. Because resource protection is the principal goal of the CCNM, visitation on the monument's rocks and islands, and use of such visitation as a basis for generating revenue, will not be emphasized.

The RMP has been developed so that management activities can be readily adapted to normal fluctuations in federal and state government funding sources. The current MOU with core-managing partners does not include a revenue development or sharing approach between BLM, DPR, and DFG. Specificity regarding shared revenues and costs will be sought as the relationship between the core-managing partners is further defined during development of implementation plans for CCNM management. Contributions and grants from sources outside the federal and state management agencies also will continue to be sought to help meet the costs of protecting and enhancing the CCNM.

The core-managing partners are dedicated to finding the most practical and efficient means of fully implementing the RMP. In this context, this includes consideration of total cost and degree of RMP goal attainment.

Plan Coordination

As discussed elsewhere, the California coast is the subject of many planning efforts. Similar to law enforcement, BLM intends to use the CCNM as a platform to help increase coordination between the variety of plans and planning entities along the coast. As part of this effort, BLM and its partners will develop a protocol to track planning efforts on adjacent and overlapping jurisdictions, and will become involved in advisory and/or participating roles as appropriate to ensure protection of monument resources. In particular, BLM will work with the Marine Region of DFG to ensure coordination between CCNM management and the actions taken under the MLPA as the marine protected areas planning process proceeds over the next few years, and NOAA's National Marine Protected Areas Center related to the implementation of Executive Order 13158. The results of this tracking effort will be used in subsequent RMP amendments and updates to ensure that the CCNM management is consistent with and relevant to other planning efforts along the coast.

The development of this RMP has included wide efforts to receive input from planning entities along the California coast. The broad circulation of this Proposed RMP is made with the goal of receiving plan consistency information from the appropriate planning entities.

Publicity

Publicity efforts about the CCNM, its resources, and visitor opportunities will use traditional media tools—including regional, statewide, and national newspapers, magazines, and periodicals; and travel-related television programming, also on regional, state, and national levels. The CCNM also will use cutting-edge technology to reach potential visitors and researchers. Information will be posted on web sites hosted by BLM and CCNM partners, and will be shared through BLM's electronic newsletters. The Virtual Monument will provide interactive means for visitors to "experience" the monument from remote locations (see the discussion under "Education and Interpretation"). Promotional products will include compact discs (CDs), digital video discs (DVDs), posters, shirts, caps, and mugs. These products will be made available at BLM field offices, coastal tourism and visitor centers, community bed and breakfast inns, and similar visitor-oriented businesses. Products also could be provided through BLM- and partner-hosted web sites.

Response to Oil Spills and Release of Other Toxic Materials

As part of CCNM management, BLM will increase its role as a federal trustee agency by furthering its coordination and involvement with the U.S. Department of the Interior's Office of Environmental Planning and Coordination (OEPC). This will involve BLM staff coordinating more closely with OSPR and FWS personnel to help BLM become an active participant in DFG's OSPR Program, and BLM will participate with the U.S. Environmental Protection Agency (EPA) and the USCG in actions associated with the National Oil and Hazardous Substances Pollution Contingency Plan. In its capacity as a federal trustee agency, BLM will participate in these efforts and offer a coordination role through its involvement with multiple jurisdictions, research entities, and resource steward organizations along the entire California coast. BLM staff will become part of spill response teams along the California coast when spills pose a real threat to the biological and scenic resources contained on the monument. BLM also will provide information on the location of important seabird and pinniped habitats associated with the CCNM and will mobilize staff as appropriate to protect monument resources. The extent of BLM's role in these programs will be modified through the course of its involvement, with primary focus on providing information, coordination, and support to the appropriate spill response agencies regarding the location of key monument resources. In addition to serving as agency and Natural Resource Damage Assessment

(NRDA) representatives on the command staff for a specific spill, likely roles for BLM staff include participation within the unified command in the planning section's environmental unit and the operations section's wildlife branch, as well as serving as the Federal On-Scene Coordinator's historic properties specialist.

2.3.5 Monitoring and Adaptive Response Program

Monitoring is an essential component of natural resource management because it provides information on changes in resource use, condition, processes and trends. Monitoring also provides information on the effectiveness of management activities and strategies. Finally, monitoring can provide excellent opportunities for public outreach and citizen involvement in management of the CCNM. Implementation of this RMP will be monitored to ensure that management actions follow prescribed management direction (implementation monitoring), meet desired objectives (effectiveness monitoring), and are based on accurate assumptions (validation monitoring).

Monitoring will be an integral component of adaptive ecosystem management. Close coordination and interaction between monitoring and research are essential for this type of management. Data obtained through systematic and statistically valid monitoring can be used by scientists to develop research hypotheses related to priority issues. Conversely, the results obtained through research can be used to further refine protocols and evaluate the effectiveness of implementation of this RMP. Monitoring results will provide managers with the information to determine whether an objective has been met and whether to continue or modify the management direction. Findings obtained through monitoring, together with research and other new information, will provide a basis for changes to the RMP.

The monitoring strategy itself will not remain static and will be periodically evaluated to ensure that the monitoring questions and standards remain relevant. The monitoring strategy will be adjusted as appropriate. Some monitoring items may be discontinued, and others may be added as knowledge and issues change with implementation. Monitoring mandated by executive order or legislation will be given priority.

The monitoring process will collect information in the most cost-effective manner possible and may involve sampling or remote sensing. Monitoring activities will be conducted by a variety of entities, depending on the nature of the monitoring. Groups that may conduct monitoring include universities, other research institutions, BLM and other agencies, private organizations, and members of the public. Community-based monitoring conducted by monument stewards will be encouraged through the partnership program and will be integrated with the education and interpretation activities identified in the management actions below.

Monitoring could be cost prohibitive if not designed carefully. It will not be necessary or desirable to monitor every management action or direction. Unnecessary detail and unacceptable costs will be avoided by focusing on key monitoring questions and proper sampling methods. The level and intensity of monitoring will vary, depending on the sensitivity of the resource, process, or trend and the scope of the proposed management activity.

Monitoring Goals

The objective of resource monitoring and evaluation is a clear understanding of the ecological structures, function, and processes that characterize the CCNM and the effects of human activities on those attributes. Accordingly, the goals for the monitoring and evaluation program are as follows:

- Provide the basis for long-term adaptive management and ongoing planning,
- Assess compliance with environmental laws, and
- Ensure that direction in the Presidential Proclamation is fulfilled.

Levels of Acceptable Change

As mentioned above, monitoring will provide information that will allow managers to evaluate changes to resource use, condition, processes, and trends. Not all changes will be positive, and management strategies must be adjusted to respond to unacceptable changes. Limits must be established that initiate adjustments in management activities. The limits of acceptable change for the CCNM will be any discernible, unnatural, negative change to key resource condition and processes.

Levels of acceptable change will be defined as resource inventories establish a baseline from which changes can be measured. This greater understanding of resource variability allows development of specific and appropriate thresholds that can trigger management consideration. Determining causes of unacceptable change will be an important task before management action will be taken. Action strategies to eliminate or minimize the unacceptable change can then be developed in order to restore the resource condition or process.

Monitoring Priorities

Top priorities for coordinated monitoring already include the following:

- Seabird use of CCNM rocks and islands,
- Pinniped use of CCNM rocks and islands,
- Human activities in the vicinity of important seabird and pinniped use areas, and
- Effects of human activities on important biological resources.

Other priorities will be based on the importance of and threat to the particular resource. Priority also will be given to monitoring mandated by executive order or legislation. Specific consideration will be given to monitoring topics and indicators that index entire ecosystems and yield information regarding multiple topics. Monitoring priorities may include physical, biological, social, and economic aspects of the CCNM.

Monitoring Protocols

Monitoring activities will be divided into two categories: technical and non-technical activities, and specific monitoring protocols will be developed for each. Technical monitoring activities will require special expertise or background in the resource being monitored and also will require rigorous monitoring protocols to yield useful data. Non-technical monitoring activities will require lower levels of expertise and could be conducted by a wider variety of entities using less rigorous protocols, while still yielding useful information.

For non-technical activities, monitoring protocols will be developed on an activity-specific basis, based on the resources to be monitored and the capabilities of the entity conducting the monitoring.

For technical activities, testable hypotheses will be developed for each topic requiring monitoring. Based on these hypotheses, the Monitoring Plan will identify the following for each topic:

- The attribute to be monitored,
- The monitoring purpose,
- The specific indicator(s) of the attribute to be measured,
- The geographic scale of monitoring,
- Monitoring methods,
- The appropriate frequency and duration of measurement, and
- Monitoring results indicating a need for reevaluation of management actions (i.e., levels of acceptable change).

These aspects of the Monitoring Plan will be informed by the management activities described in this chapter under "Proposed Resource Management Plan." Monitoring activities may be located within or outside the CCNM as necessary, based on the ecological relationships to the surrounding area or the scope of the monitoring topic.

Attributes will be selected for monitoring based on their ability to guide management direction, and indicators will be chosen to be sensitive to resource condition. Indicators also will be selected that are predictive rather than retrospective, such that they provide "early warning" of changes in resource condition and necessary management response. Monitoring protocols will be based on sound experimental design and standardization, and will support statistical analysis where necessary.

Entities Conducting Monitoring

The Monitoring Plan will identify the parties that will conduct monitoring and their relative responsibilities. As previously discussed, it is anticipated that a consortium of partners at all levels will be engaged to undertake monitoring, with primary responsibility on BLM and the core-managing partners. The monitoring process will be designed to integrate with existing organizational structures and monitoring/research programs as much as possible. To this end, the monitoring priorities and protocols will consider common monitoring design frameworks and common indicators based on the range of existing monitoring and research efforts underway.

Implementation Guidelines

Monitoring

Monitoring efforts will be proactive where funding permits and the Monitoring Plan will be implemented to the fullest extent feasible.

All monitoring and evaluation activities will be fully documented. Monitoring and evaluation reports will indicate monitoring methodologies, results, and conclusions. Conclusions will include assessment of measured results against expected results, implications to the prospect for meeting management goals in any program area, determination of acceptability of results, and formulation of measures that could bring about desired changes to monitored attributes.

BLM will develop a standardized repository for data and analysis, and data gained through monitoring will be shared and made available through the various means previously identified—such as the internet and data sharing programs (e.g., SIMoN).

Evaluation and Adaptive Responses

Monitoring results will be evaluated upon collection. Because the purpose of monitoring is to guide plan implementation, a detailed evaluation and an adaptive response will be developed when monitoring results indicate that objectives are not being met. These adaptations may require a refinement or modification of management actions.

If a significant management modification is indicated that is outside the bounds of the actions identified in this RMP, an amendment of this RMP may be required. Significance usually is associated with monitoring results indicating that management direction for various plan elements are inhibiting achievement of management goals of another plan element (e.g., a significant conflict between recreation access and species management is developing). In such cases, the required adaptation will be formulated to give priority to the primary purposes for which the CCNM was created: protection of resources.

Table 2-1. Summary of Management Actions in the Proposed RMP

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Resource/Use Program Area	Management Actions and Allowed Uses
Geologic, Soil, and Paleontologic Resources	**Data Recovery.** Where unique paleontologic resources exist that are threatened by natural processes or human activity, allow for excavation and data recovery, if it is determined that this action will not adversely affect sensitive geological, physical, or cultural resources or resource values. **Education and Interpretation.** Develop educational and interpretive materials that identify the nature and value of physical resources of the monument (discussed in more detail under the resource use "Education and Interpretation"). **Management Criteria.** Develop criteria for identifying resources requiring protection. Criteria will include, but not be limited to, the unique nature of the resource in question, the sensitivity of the resource to disturbance, and the threat or potential threat to the resource. Identify areas requiring additional management based on the above criteria. This process will be ongoing as information becomes available through research and inventory. **Research.** Following any research, maintain an inventory of monument resources The plan allows for on-monument activities that would not harm the physical resources of the monument. Existing BLM land withdrawals and guidance contained in the Presidential Proclamation prohibit removing minerals with commercial value from the monument.
Cultural Resources	**Initial Management.** As an interim management action while NRHP determinations are in process, cultural resources will be managed for their information, public, or conservation values as per BLM Manual 8100, the Federal Land Policy and Management Act (FLPMA), and the National Historic Preservation Act (NHPA). Until formal National Register of Historic Places (NRHP) eligibility determinations are made in consultation with the State Historic Preservation Officer (SHPO), each known resource will be managed as if it were a significant cultural resource. **Eligibility for Listing in NRHP.** Prepare nominations as appropriate for cultural resources in the CCNM that are potentially eligible for listing in the NRHP. Obtain a determination of which cultural resources are suitable for listing. **Cultural Resources Management Plan.** Cultural resources management plans (CRMPs) may be prepared for each eligible resource that will address preservation actions, including management of site visitation. **Consultation with Tribes.** BLM will consult further with Native American tribes to gather information about traditional use areas and activities that may include elements of the CCNM, to support the allowable uses as identified in the plan.

Table 2-1. Summary of Management Actions in the Proposed RMP (continued)

Resource/Use Program Area	Management Actions and Allowed Uses
Cultural Resources (continued)	**Education and Interpretation.** An education and interpretation program will be developed around the CCNM's significant cultural properties (discussed in more detail under the resource use "Education and Interpretation"). The program may include printed and web-based material, and also may involve public events organized around historic and/or prehistoric themes at or near significant coastal sites. **Research and Resource Characterization.** Research for the purposes of evaluation, site characterization, and scientific investigation is encouraged when such research is consistent with the objectives of the RMP, the BLM Statewide Protocol Agreement, and CRMPs developed under the umbrella of the Protocol. The plan allows for Native American traditional and interpretive activities on the monument where consistent with resource protection, limits on-monument activities that might harm cultural resources, and specifies that inadvertent or unanticipated discoveries be treated according to the terms of the State Protocol Agreement.
Vegetation Resources	**Criteria for Management.** Documentation that harm to a listed plant species is occurring will be an overriding criterion for implementing management action. As an initial step in RMP implementation, additional criteria will be developed for identifying the plant species and communities requiring management and protection. Criteria will include, but not be limited to, the unique nature of the resource in question, the sensitivity of the resource to disturbance, and the threat or potential threat to the resource. **Site Inventory.** An inventory of vegetation and vegetation communities will be maintained. As part of the site inventory, BLM will make elimination of the identified gaps in knowledge about the distribution and status of plant species a primary goal (discussed in more detail under the "Research" resource use category). On the basis of the above activities, BLM will work cooperatively with California Department of Fish and Game (DFG), California Department of Parks and Recreation (DPR), U.S. Fish and Wildlife Service (FWS), and other agencies to identify rocks and islands in need of management attention. **Adaptive Management.** A variety of management activities may be implemented in the specific areas identified for management, including but not limited to: ▪ Targeted education to make CCNM users aware of existing or potential conflicts associated with important native plant communities in specific monument locations. ▪ Enforcement actions.

Table 2-1. Summary of Management Actions in the Proposed RMP (continued)

Resource/Use Program Area	Management Actions and Allowed Uses
Vegetation Resources (continued)	▪ Active management, including restoration or other forms of management intervention. ▪ Use restrictions, as described in the plan. **Invasive Non-Native Species Control.** Develop an invasive non-native plant species management and eradication program, consistent with the long-term protection of native plant communities. This program will be designed to reduce competition from non-native plants and encourage the long-term survival of native plant communities. **Education and Interpretation.** Develop educational and interpretive materials that identify the nature and value of vegetation resources of the monument (discussed in more detail under the resource use "Education and Interpretation"). **Research.** Following any research, maintain an inventory of monument resources. The plan does not allow on-monument uses that would result in loss of native plants, unless otherwise permitted through BLM's normal procedures for granting access for research or other activities. Management intervention normally will begin with the least restrictive approach (e.g., use ethics education), with access limitations implemented on the CCNM as a last resort.
Wildlife Resources	**Criteria for Management.** Documentation that harm to a listed wildlife species is occurring will be an overriding criterion for implementing management action. As an initial step in RMP implementation, additional criteria will be developed for identifying the wildlife species and habitat types requiring management and protection. Criteria will include, but not be limited to, the unique nature of the resource in question, the sensitivity of the resource to disturbance, and the threat or potential threat to the resource. **Site Inventory.** An inventory of wildlife and wildlife habitat will be maintained. As part of the site inventory, BLM will make elimination of the identified gaps in knowledge about the distribution and status of seabirds and pinnipeds a primary goal (discussed in more detail under the "Research" resource use category). Other inventory priorities will be established and promoted at the outset, including: ▪ A monument-wide survey of seabirds and pinniped populations coordinated with researchers studying marine birds and mammals. Surveys will occur at minimum 10-year intervals using appropriate protocols, such as those developed by Sowls et al. (1980) and Carter (pers. comm.), that include recently developed survey techniques. The modifications of this survey protocol will preserve the ability to compare future data with these earlier benchmarks.

Table 2-1. Summary of Management Actions in the Proposed RMP (continued)

Resource/Use Program Area	Management Actions and Allowed Uses
Wildlife Resources (continued)	▪ Focused surveys (especially in northern California and at sites in southern California potentially hosting Xantus' murrelets) for populations of nocturnal and burrow- or crevice-nesting species such as storm-petrels and the small alcids, as well as widespread species that nest in small numbers at any one site. Criteria for identifying inventory sites will include such characteristics as: - Rocks and islands with soil or extensive cavities that provide potential nesting sites for storm-petrels and burrowing alcids; - Cliffs that are inaccessible to terrestrial predators and have niches or crevices that are suitable nesting sites for pelagic cormorants and pigeon guillemots; and - Mussel flats adjacent to or part of rocks and islands that project above high waves sufficiently to allow oystercatcher nests. ▪ Additional focused annual surveys on selected species and sites based on partnership/stakeholder interest and abilities. For example, local groups or individuals could perform valuable long-term monitoring projects at sites where marine bird and mammal populations are visible from the mainland and counts of marine mammals and nesting birds or assessments of their reproductive status can be conducted easily. ▪ Surveys to determine status regarding invasive wildlife species and their effects on native populations. Inventory efforts will include surveying for invasive species such as rodents (e.g. *Rattus* sp. and *Mus musculus*) and Canada goose (*Branta canadensis*). ▪ Surveys to determine status regarding human use of the CCNM and its effects on wildlife habitat and populations. ▪ Surveys for intertidal species. The inventory will be accomplished through BLM activities and through partnerships. The task will be to identify specific data gaps, publicize the need for specific survey and status investigations, and cooperate with appropriate groups to enhance their ability to perform the necessary projects. On the basis of the above activities, BLM will work cooperatively with DFG, DPR, FWS, and other agencies and partners to identify rocks and islands in need of management attention.

Table 2-1. Summary of Management Actions in the Proposed RMP (continued)

Resource/Use Program Area	Management Actions and Allowed Uses
Wildlife Resources (continued)	**Adaptive Management.** A variety of management activities may be implemented in the specific locations identified for management listed above, including but not limited to: ▪ Targeted education to make CCNM users aware of existing or potential conflicts associated with wildlife habitat in specific monument locations. ▪ Enforcement actions. ▪ Active management, including restoration or other forms of management intervention. ▪ Use restrictions. **Invasive Non-Native Species Control.** A program for control and eradication of invasive wildlife species on the CCNM rocks and islands will be developed and implemented where effects on native populations of marine birds and mammals, and other monument resources, have been documented or are suspected. Priorities for implementation will be given to areas where problems are most acute (such as areas where native populations are shown to be in decline as a result of invasive species). This effort will be designed to reduce competition with native wildlife, predation on native vegetation, and degradation of habitat—and will encourage the long-term survival of native or unique monument communities and habitat. **Restoration Measures.** BLM, in cooperation with its core-managing partners, will develop and implement measures to restore or improve habitat, and to control predators. **Education and Interpretation.** Educational and interpretive materials will be developed that identify the nature and value of wildlife resources of the monument (discussed in more detail under the resource use "Education and Interpretation"). Signs and educational materials will be made available to the public near important marine mammal haul-outs, major tidepool areas, marine bird nesting sites and at access points. A particular focus will be tidepools. Where known conflicts with wildlife exist, activities that harm wildlife resources or access to particular sites may be restricted on the monument. Restrictions of access to the CCNM will be made considering local knowledge of seabird and pinniped use (e.g., known nesting and pupping seasons), existing and potential use conflicts, and enforcement considerations. Activities that will be closely managed during seasonal restrictions include those with the potential to disturb wildlife. Management intervention normally will begin with the least restrictive approach (e.g., use ethics education), with seasonal access limitations implemented on the CCNM as a last resort. Such use limitations will be implemented only on a site-specific basis where known resource impacts exist and will use a science-based process to determine what limits are appropriate.

Table 2-1. Summary of Management Actions in the Proposed RMP (continued)

Resource/Use Program Area	Management Actions and Allowed Uses
Visual Resources	**Visual Contrast Ratings.** Complete visual contrast ratings for existing CCNM facilities and identify opportunities to reduce existing visual impacts through modifications (e.g., removing unused non-historic navigational devices and rehabilitating landscape scars). Complete visual contrast ratings for all proposed surface-disturbing projects to ensure they meet VRM class objectives. **Inventory of Vista Points.** Complete an inventory of existing and potential key scenic vista points along road and trail corridors adjoining the CCNM, and identify opportunities to work with core-managing and collaborative partners to improve these locations as overlooks and interpretive sites available to the public. The plan allows uses on BLM lands that do not detract from coastal vistas. It also allows for navigational aids on the monument where there is no alternative location that would meet the public safety needs.
Recreation	**User Experience.** The recreation approach for the monument will consist of primitive non-motorized, non-mechanized activities. **Recreational Facilities.** BLM will place recreation facilities on the monument only when consistent with the resource protection goals of the plan. **Signage.** Signage will be installed at key locations along the mainland regarding the allowed and prohibited recreational uses of the CCNM. Warning signs will be provided in hazardous areas with high visitation or acute risks. **Research.** An inventory will be maintained for information generated by any recreation-related research. **Educational Materials.** Educational and interpretive materials will be developed that identify the nature and value of recreational opportunities of the monument (see the Education and Interpretation program below). Printed and web-based resources will be generated that publicize the encouraged and prohibited recreational uses of the CCNM. The location of key recreation access points to the monument also will be described. Training materials, brochures, and educational information regarding protection of CCNM resources will be provided to other entities offering recreation along the coast (e.g., county parks employees and kayak rental companies). Recreational uses of the monument will be allowed when consistent with the primitive non-motorized, non-mechanized goals and when consistent with proclamation goals and public safety concerns. (See Section 2.2.3, "Management of Resources Uses—Recreation—Allowable Uses" for details on allowed and restricted recreation uses.) Management intervention normally will begin with the least restrictive approach (e.g., use ethics education), with access limitations implemented on the CCNM as a last resort. Such use limitations will be implemented only on a site-specific basis where known resource impacts exist and will use a science-based process to determine what limits are appropriate.

Table 2-1. Summary of Management Actions in the Proposed RMP (continued)

Resource/Use Program Area	Management Actions and Allowed Uses
Education and Interpretation	**Educational and Interpretive Facilities.** BLM will place educational and interpretive facilities on the monument only when consistent with the resource protection goals of the plan. New mainland facilities will be constructed in a manner consistent with the existing visual character of the coastal environment so as not to detract from existing scenic resources. These facilities will be located on the landward side of State Route 1 to the maximum extent practicable to protect the quality of the scenic values of the CCNM and adjacent lands for persons traveling along that route. **Educational and Interpretive Plan(s).** Management of education and interpretation at the CCNM will be achieved through the development of an Education and Interpretation Plan, or a series of regional or site-specific plans, which will identify goals, themes, general guidelines, and an action plan for CCNM education and interpretation. As part of this plan, the following actions will be taken in coordination with the core-managing partners and other partnering entities, as appropriate: ■ Expand on preliminary data to complete a comprehensive inventory of existing coastal facilities that could serve as visitor gateways. The inventory will address the criteria given below for selection of gateways. ■ Identify mainland gateways where visitors will be able to receive educational and interpretive materials regarding the CCNM. ■ Develop educational and interpretive programs at these visitor gateways, using existing or new BLM or partner facilities and infrastructure, as funding permits. ■ Generate and distribute printed and web-based resources regarding the CCNM. Educational and interpretive materials will be offered in multiple languages, as appropriate, to allow greater accessibility by non English-speaking populations. **CCNM Gateways.** A series of CCNM Gateways will be developed to provide a sense of place for the monument, serve as visitor contact points, and link the CCNM with local communities and local initiatives. These mainland visitor gateways have been identified and additional visitor gateways will be identified using the following criteria: ■ Presence of appropriate pre-existing visitor facilities and infrastructure to accommodate CCNM educational exhibits and interpretation (e.g., visitor centers and parking and day use areas); ■ Sensitivity of CCNM resources in the vicinity (e.g., proximity and sensitivity to disturbance from shoreline);Size and number of rocks and islands in the vicinity; ■ Proximity to well traveled roads and frequently visited coastal public properties; ■ Visual accessibility from nearby vistas, roads, and other coastal access points;

Table 2-1. Summary of Management Actions in the Proposed RMP (continued)

Resource/Use Program Area	Management Actions and Allowed Uses
Education and Interpretation (continued)	▪ Local community interests and concerns ▪ Costs associated with establishing visitor contact, and availability of funds; and ▪ Participation by partnering entities. The CCNM Gateways will include a hosted site. Hosting will be performed by BLM and/or its partners, depending on the site. Each CCNM Gateway will provide information regarding the specific gateway, including the various CCNM features associated with that specific portion of the CCNM. Information regarding the other established CCNM Gateways should also be available to the visitor. In addition, each gateway can develop their own educational initiatives specific to its unique resources and thematic focus. Each gateway is expected to develop its own local partnership and community outreach initiatives. **Un-Hosted Visitor Sites**. A number of un-hosted visitor sites or "CCNM waysides" may be developed. These could include informational or interpretive kiosks or panels, as well as nature or viewing trails, if appropriate. Some of these sites may be directly associated with a CCNM Gateway, while others may not be. In all cases, they are intended to provide individuals and organizations opportunities for nature study and photography, interpretive sessions and walks, school and community outreach programs, and special thematic events related to the unique resources of the CCNM. **Provisions for Facility Construction.** Any facilities to be constructed will be built to applicable standards; BMPs and other measures will be implemented to avoid adverse effects on natural resources and the human environment. Any new facilities with potential for adverse effects will be subject to additional environmental review under NEPA.
Research Activities	**Research/Monitoring Permit System.** Research will be permitted throughout the CCNM. Permits will be required for scientific studies on CCNM land that involve field work or specimen collection with the potential to disturb resources. In coordination with the core-managing partners, BLM will develop research/ monitoring permit stipulations that will be used by all three agencies in permitting and sharing research related to the CCNM. The core-managing partners will coordinate and consult on all major research permit decisions. The permit stipulations for on-monument use will also be consistent with current BLM requirements under 43 CFR 2920, "Leases, Permits, and Easements through Issuance of a Special Use Permit." When permits are required for scientific activities pertaining solely to cultural and paleontological resources, including archaeology, ethnography, history, museum objects and collections, cultural landscapes, and historic and prehistoric structures, other permit procedures will apply pursuant to applicable regulations. Permits from other agencies besides the core-managing partners may be recognized, subject to notification and consultation with these agencies

Table 2-1. Summary of Management Actions in the Proposed RMP (continued) Page 9 of 10

Resource/Use Program Area	Management Actions and Allowed Uses
Research Activities (continued)	Research is an allowable use under the plan. Permits may be issued for research after a thorough review of the research goals, strategies, and operational details. BLM may authorize partner staff to carry out official duties without requiring a permit. BLM and partner staff will need to comply with professional standards and conditions normally associated with scientific research/monitoring permits issued by BLM.
Land Use Authorizations	**Consideration of Applications.** Each application for use of CCNM lands will be considered on a case-by-case basis, considering the potential for the use to affect CCNM resources and the consistency of the use with the goals and policies of this RMP. **Provisions for Facility Construction.** Any facilities to be constructed will be built to applicable standards; BMPs and other measures will be implemented to avoid adverse effects on natural resources and the human environment. Any new facilities with potential for adverse effects will be subject to additional environmental review under NEPA. Land uses of the monument will be allowed when consistent with proclamation goals and public safety concerns. (See Section 2.2.3, "Management of Resources Uses—Land Use Authorizations—Allowable Uses" for details on allowed and prohibited land uses.)
Land Tenure Adjustments	**Disposal.** No monument lands are identified for disposal under this RMP. **Exchange.** Exchange will be considered where it will further the resource protection purposes of the CCNM and meets the criteria discussed below. **Acquisition.** Acquisition of additional properties will be considered where it will further the resource protection purposes of the CCNM and meets the criteria discussed below. During plan implementation, preliminary lists of possible acquisitions will be reviewed and prioritized in cooperation with other resource management agencies along the coast.
	Decision Criteria. Land tenure adjustments will be considered on a case-by-case basis, using criteria that will include, but not be limited to, the following: ▪ Value or significance of biological, cultural, and geologic resources; ▪ Threat level to the resources; ▪ Opportunity; ▪ Cost/funding availability; and ▪ Participation of partnering entities.

Table 2-1. Summary of Management Actions in the Proposed RMP (continued) Page 10 of 10

Resource/Use Program Area	Management Actions and Allowed Uses
Special Management	**California Coastal ACEC.** After careful evaluation of the resources recognized by the 1990 designation of the California Islands Wildlife Sanctuary as an ACEC, it was determined that their protection would be enhanced by maintaining the ACEC designation. The name of the California Islands Wildlife Sanctuary will be changed to the California Coastal ACEC, and the ACEC designation will be maintained. **Other Designations.** Other special designations may occur in the future as warranted, following standard BLM procedures. **Wilderness Characteristics.** The monument will be managed to protect its wilderness characteristics. The management prescriptions to protect wilderness character will be consistent with the direction found within the Proclamation designating the CCNM.
Cadastral Support	**Clarification of Ownership.** BLM will continue efforts to clarify land ownership, where ownership is unknown, believed to be inaccurate, or in dispute. **Changes in Ownership.** Changes in land ownership status of rocks and islands under CCNM jurisdiction will be documented through surveying so that the geographic extent of land use decisions in this plan is clearly understood. **Survey Strategy.** A survey strategy will be developed to guide cadastral work for the CCNM. Priority areas for surveying and mapping will be developed, and a time frame for completion will be specified.

Chapter 3. Comments and Responses

Copies of the comment letters received on the California Coastal National Monument Draft Resource Management Plan/Draft Environmental Impact Statement (Draft RMP/Draft EIS) and responses to comments are included in this chapter. Numerous comments related to the general issues of jurisdictional authority, sensitive site characterization, and recreational access. BLM prepared master responses to respond to these common concerns.

This chapter also contains a summary of comments received in seven public meetings held for the project. For the following six recurring themes in oral comments, BLM developed master meeting responses: jurisdiction, sensitive sites, recreational access, intertidal species, coordination, and Marine Life Protection Act coordination.

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Chapter 3

Comments and Responses

3.1 Introduction

The purpose of the public review process was to receive input on the content of the Draft RMP/Draft EIS. A total of 174 comment letters, including e-mails and response forms, was received on the Draft RMP/Draft EIS. Many of these letters contained statements of preference and personal anecdotes about time spent along the coast and in waters surrounding the CCNM. Comment letters that did not address substantive issues related to the Draft RMP/Draft EIS are not reprinted in this Final EIS. The authors and dates of these letters are listed in sections that follow.

Each letter received on the Draft RMP/Draft EIS that contained one or more substantive comments was assigned a number (for example, Letter 1), and comments within each letter were lettered consecutively (for example, 1-A, 1-B, 1-C, 1-D…). These comment identification letters are noted in the right margins of the comment letters, adjacent to the individual comments. In this chapter, all of the letters with substantive comments are provided, followed by BLM's responses to all these letters. The responses are numbered to correspond with the identification numbers in the right margins of the comment letters. Where the response indicates that a change was made to the EIS, the relevant text change can be found in Chapter 4. Changes to the Proposed RMP are found in Chapters 1, 2, and 5. Table 3-1 lists all comment letters that contained substantive comments on the Draft RMP/Draft EIS.

Following release of the Draft RMP/Draft EIS, BLM conducted a series of public meetings along the coast to update the public on the CCNM planning process and to receive comments on the draft documents. This chapter also summarizes and responds to the oral comments received at these public meetings (see Section 3.6, "Responses to Public Meeting Comments").

Table 3-1. Substantive Comments Received on the Draft RMP/Draft EIS

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Federal Agencies		
14	U.S. Environmental Protection Agency (October 22, 2004)	3-112
37	U.S. Coast Guard (December 10, 2004)	3-118
41	U.S. Fish and Wildlife Service (December 13, 2004)	3-119
46	NOAA Monterey Bay National Marine Sanctuary and Gulf of the Farallones National Marine Sanctuary (December 15, 2004)	3-123
47	NOAA National Marine Fisheries Service (December 15, 2004)	3-125
48	U.S. Navy (December 15, 2004)	3-127
53	U.S. Minerals Management Service (December 16, 2004)	3-136
58	National Park Service, Pt Reyes National Seashore (December 16, 2004)	3-139
State Agencies		
4	Southern California Association of Governments (October 5, 2004)	3-108
43	California Coastal Commission (December 13, 2004)	3-122
52	California Department of Parks and Recreation (December 16, 2004)	3-135
56	California State Lands Commission (December 17, 2004)	3-137
Local Agencies		
22	County of Del Norte (October 26, 2004)	3-114
Non-Governmental Agencies		
6	Recreational Fishing Alliance (October 26, 2004)	3-109
33	Ocean Laguna Foundation (December 1, 2004)	3-117
38	Surfrider Foundation (December 10, 2004)	3-119
39	Natural Resources Defense Council (December 10, 2004)	3-119
42	Sonoma County Abalone Network (December 13, 2004)	3-121
44	Mendocino Coast Audubon Society (December 14, 2004)	3-122
49	Mendocino Seaweed Stewardship Alliance (December 15, 2004)	3-133
54	Mendonoma Marine Life Conservancy (December 16, 2004)	3-136
55	Maritime Shoshone, Inc. (December 16, 2004)	3-137
57	Sierra Club, Coastal Programs (December 16, 2004)	3-138
59	National Marine Manufacturers Association (December 16, 2004)	3-140
60	American Sportfishing Association (December 16, 2004)	3-141
63	Rising Tide Sea Vegetables (December 16, 2004)	3-142
64	Yurok Tribe (December 29, 2004)	3-142

Table 3-1. Substantive Comments Received on the Draft RMP/Draft EIS (continued)

Comment Letter Number	Commenter (Date of Letter)	Page Number
Individuals		
1	Identification Withheld (September 22, 2004)	3-107
2	James A. Springer (September 23, 2004)	3-107
3	Identification Withheld (September 25, 2004)	3-108
5	Louise Mariana (October 5, 2004)	3-108
7	Matthew Rode (October 11, 2004)	3-110
8	Howard Egan (October 14, 2004)	3-110
9	Tom Lima (October 17, 2004)	3-111
10	Khi Lai (October 21, 2004)	3-111
11	Mah Dallam (October 21, 2004)	3-111
12	Mark Cortright (October 21, 2004)	3-111
13	Ross Taylor (October 21, 2004)	3-112
15	Kit Mann, Kokatat Water Sportswear (October 22, 2004)	3-112
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19	Tanya Smart (October 22, 2004)	3-113
20	Melody Hamilton (October 23, 2004)	3-114
21	Rodney A. Reindl, Sharon K. Reindl, Mark J. Reindl, and Kathryn M. Reindl (October 25, 2004)	3-114
23	Charles Wilson (October 26, 2004)	3-115
24	Identification Withheld (October 29, 2004)	3-115
25	Judd Smith (November 3, 2004)	3-115
26	Judd Smith (November 3, 2004)	3-116
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34	Glenn Stockwell (December 6, 2004)	3-118
35	Identification Withheld (December 9, 2004)	3-118
36	Cristy Sabo (December 10, 2004)	3-118
40	Cristy Sabo (December 12, 2004)	3-119
45	Leland R. Lewis (December 15, 2004)	3-123
50	Kort Orbach (December 15, 2004)	3-133

Table 3-1. Substantive Comments Received on the Draft RMP/Draft EIS (continued)

Comment Letter Number	Commenter (Date of Letter)	Page Number
Individuals (continued)		
51	Charles Wilson (December 16, 2004)	3-134
61	Julie Verran (December 16, 2004)	3-141
62	Barbara Stephens (December 16, 2004)	3-141
65	Howard Egan (December 29, 2004)	3-143
66	Identification Withheld (October 22, 2004)	--

3.2 Comment Letters

The following pages contain comment letters received on the Draft RMP/Draft EIS.

①

CCNM DRMP/DEIS
E-mail comment
Received: 09/22/04, 11:04 pm

city = San Juan Capistrano
state = Ca

email =
comment = By severly limiting our ability to fish and dive or spear fish you
not only take away the carrot that keeps us going you hurt the already 1-A
damaged economy and cause our hard earned money to be spent in other
countries. Every day it seems we are told we are free but I and many others
feel this government is not interested in our refuge and that we are the ones
put into cages. Do you believe people will spend their hard earned money and
their limited time fishing if fishing was realy bad. Too much government 1-B
control reminds me of another country I don't wish to mention. It is my
belief this country causes many of its own problems. I wish I could feel
better about it. I say this with a heavy heart. Don't preach freedom and show
us otherwise. The commercial fishing and their methods are more to blame so 1-C
why punish the little guy. Haven't you noticed that more and more people
don't vote. Ever wonder why?
withhold_id = withhold identification info
Submit = Submit

---

②

James A. Springer
6333 Chaffee Street
Ventura, California 93003
(805) 654-8001
Fax (805) 654-8002

September 23, 2004

Herrick E. Hanks
California Coastal National Monument Manager
USDI Bureau of Land Management
299 Foam St.
Monterrey, CA 93940

Re: Draft RMP/Draft EIS for California Coastal National Monument

Dear Mr. Hanks:

I have just reviewed the Draft RMP/Draft EIS for California Coastal National Monument document
and am very concerned about it's potential impact on recreational users such as skin and scuba divers 2-A
and fishermen. Sportfishing is currently primarily regulated by the Department of Fish and Game
and, while they could do a better job of it, they are well suited for this task from their extensive 2-B
experience and enforcement in this area. It makes little sense for BLM to duplicate this effort and take
on issues they are not best suited to do. I am very concerned about the idea of "appreciate from afar"
and how this might be interpreted. Recreational users are, by nature, a low impact group in the areas 2-C
specified in this document. Further regulating our activities and forcing us to "appreciate from afar"
would seriously undermine our enjoyment of these precious resources while allowing little actual benefit
to the resource. In this respect Plans A, B and C are poorly drafted, leaving only the "No Action" 2-D
alternative.

It appears that there are benefits that might be pursued under BLM management, however restriction of
access and procurement of game species for recreational divers and fishermen is a bad idea and best left 2-E
to the agencies that currently regulate it.

Please consider these comments prior to implementing any plan. Most recreational simply want the right to enjoy our precious resources, not destroy them.

Thank you for your consideration in this matter.

Sincerely,

James A. Springer

③

To: cacnm@ca.blm.gov
cc:
Subject: Draft RMP Feedback

city = Granada Hills
state = CA

comment = I am 59 years of age and have been a recreatioal fisherman since
very early childhood. I have fished our coast for over 50 years. I would hope
that my grandson will be able to do the same. I strongly hope for no action in
this matter. I also worked as a deckhand on a commercial passenger sport
fishing boat in 1961 - 1963. The only changes there have been to the coast
where we operated has been housing on the beach. You don't have to worry about
to much impact people have on our coast. Most people can't afford fuel for
thier cars and boats to go there. Why is it that the California coast line was
singled out in this rediculouse manner at the 11th our of President Clintons 3-A
term. Sounds like it was a favor returned or political move against the new
president. I will continue to lobby against this proclomation and follow the
political carrers of those in favor of it. I also think that this would be the 3-B
biggest waste of money to inforce and most people would ignore it anyway.
Please take no action and stop wasting our tax dollars. If you want to spend
money, do it by building more fish habitats !!
withhold_id = withhold identification info
Submit = Submit

---

④

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Orange County: Chris Norby, Orange County • Lou Bone, Tustin • Art Brown, Buena Park • Richard Chavez, Anaheim • Debbie Cook, Huntington Beach • Cathryn DeYoung, Laguna Niguel • Richard Dixon, Lake Forest • Alta Duke, La Palma • Bev Perry, Brea • Marilyn Poe, Los Alamitos • Tod Ridgeway, Newport Beach

Riverside County: Marion Ashley, Riverside County • Thomas Buckley, Lake Elsinore • Bonnie Flickinger, Moreno Valley • Ron Loveridge, Riverside • Greg Pettis, Cathedral City • Ron Roberts, Temecula

San Bernardino County: Paul Biane, San Bernardino County • Bill Alexander, Rancho Cucamonga • Edward Burgnon, Town of Apple Valley • Lawrence Dale, Barstow • Lee Ann Garcia, Grand Terrace • Susan Longville, San Bernardino • Gary Ovitt, Ontario • Deborah Robertson, Rialto

Ventura County: Judy Mikels, Ventura County • Glen Becerra, Simi Valley • Carl Morehouse, San Buenaventura • Toni Young, Port Hueneme

Orange County Transportation Authority: Charles Smith, Orange County

Riverside County Transportation Commission: Robin Lowe, Hemet

Ventura County Transportation Commission: Bill Davis, Simi Valley

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October 5, 2004

Mr. Herrick (Rick) E. Hanks
Monument Manager
Bureau of Land Management
California Coastal National Monument
299 Foam Street
Monterey, CA 93940

RE: **SCAG Clearinghouse No. I20040640 California Coastal National Monument (CCNM)**

Dear Mr. Hanks:

Thank you for submitting the **California Coastal National Monument (CCNM)** for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

We have reviewed the **California Coastal National Monument (CCNM)**, and have determined that the proposed Project is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) Guidelines (Section 15206). Therefore, the proposed Project does not warrant comments at this time. Should there be a change in the scope of the proposed Project, we would appreciate the opportunity to review and comment at that time. 4-A

A description of the proposed Project was published in SCAG's **September 16-30, 2004** Intergovernmental Review Clearinghouse Report for public for review and comment.

The project title and SCAG Clearinghouse number should be used in all correspondence with SCAG concerning this Project. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact me at (213) 236-1867. Thank you.

Sincerely,

JEFFREY M. SMITH, AICP
Senior Regional Planner
Intergovernmental Review

10-5-04

⑤

Dear BLM

Here are my comments on the Coastal Monument Plan - although I have NOT read the Draft Plan -

Obviously, many of the Rocks are breeding - nesting - rookery sites for many species of birds - 5-A

They MUST not be disturbed by humans - be it because of fishing or just plain curiosity seekers - or "birders" Boats of all types must keep their distance - Kayakers and Canoeist can approach these rocks with ease, thereby disturbing breeding birds - (all this is true for sea mammals, too, but my "special interest" is birds)

Public education is all we've got - Raising awareness - developing in humans a concern and consideration for other species' needs. 5-B

Therefore - here are my suggestions on how to reach the public and let them know about the Coastal Monument

②

Put press releases - notices, etc in all the Ocean Related magazines and journals - I'm sure there's a ton of them, so that's a good way to reach alot of people - Remember Canoe/Kayak magazines, and groups - Get listings of those groups and submit articles for their newsletters Also, contact, boating, canoe, kayak rental businesses and send them informational brochures for the renters - 5-B

And you must discourage off-shore oil/gas exploration - we all know what oil spills do - So all the public education (as I've outlined above) will be ludicrous - if an oil spill smothers a large surface area of water surrounding a breeding area - 5-C

If you want the public to respect the ocean, rocks, birds, mammals, etc, then BLM must 5-D

③

set an example and show the public that it cares too. 5-D

"Thanks for listening"

Please keep me informed as the process moves along -

Recreation is fine, but it MUST NOT Take place in habitat areas -

All the other species have a right To go through life - unmolested by MAN- 5-E

Good Luck

Louise

Ms. Louise Marlana
PO Box 416
Mendocino, CA 95460

RECREATIONAL FISHING ALLIANCE
CALIFORNIA STATE CHAPTERS

The Recreational Fishing Alliance Headquarters
P.O. Box 3080
New Gretna, New Jersey 08224
Phone
Toll Free: 1-888-564-6732
(609) 294-3315
Fax: (609) 294-3816

⑥

Rick Hanks
Manager, California Coastal National Monument
299 Foam Street, Monterey, CA 93940

Recreational Fishing Alliance (RFA) Comments on U.S. Department of the Interior, Bureau of Land Management (BLM), California Coastal National Monument Draft Resource Management Plan/Draft Environmental Impact Statement (Draft RMP/Draft EIS)

RFA is a national 501 (c) (4) non-profit grassroots political action organization whose mission is to safeguard the rights of saltwater anglers, protect marine, boat and tackle industry jobs, and insure the long-term sustainability of our nation's marine fisheries. It currently has 85,000 members nationally, and many thousands in coastal California from San Diego to Crescent City, and inland from these coastal areas. Saltwater anglers and RFA members include private boaters, anglers that fish aboard party boats, shore anglers from rocks and the surf, kayak anglers, a burgeoning group, as well as free divers and scuba divers. Some saltwater anglers even fish from surfboards. All must purchase licenses from Department of Fish and Game (DFG), and all are regulated by the DFG as to fishing seasons, areas open and closed, allowable take of specific species, take limits, size limits, depths restrictions, etc.

As a representative of saltwater anglers, we intend to confine our remarks to proposals and elements of the Draft RMP/Draft EIS that may negatively affect us as stakeholders, and that appear to encroach on the jurisdiction of the DFG and the regulatory role of the Fish and Game Commission (F&GC), the latter hardly mentioned in the BLM documents. We welcome this opportunity to comment because we just recently became aware of the BLM Draft RMP/Draft EIS. 6-A To the best of our knowledge, none of the California and/or national sportfishing organizations was contacted to participate in the Draft scoping process, but we note that organizations that have been active against recreational fishing and in favor of no-take MPAs are included among the BLM's "Collaborative Partners," and we note that during the scoping process (see http://www.ca.blm.gov/pa/coastal_monument/Scoping_Report.htm) these organizations made recommendations to ban or limit fishing at, around, and adjacent to BLM rocks, pinnacles, and exposed reefs. 6-B It appears that even NOAA was not invited to the scoping process. If NOAA was invited and commented, RFA would appreciate a copy of NOAA's comments sent to one of the signatories of this document.

RFA's comments are grouped into three categories: General Comments; Comments on Plan A, the Preferred Alternative, called "Balanced Management;" and Summary, Language Problems, and Omissions. The language used throughout the Drafts is broad, ill defined, and lacks definition or precision in relation to BLM intent, and may lead to a de-facto ban on sportfishing once the RMP/EIS is codified. Such an implied ban, even if it is only the result of imprecise language, can create interpretative problems that may lead to litigation against the BLM by anti-fishing groups, as will be noted in all our comments. 6-C

1

General Comments

6-D Although the jurisdiction of BLM pertains to rocks, pinnacles, and exposed reefs "above mean high tide within 12 nautical miles of the State of California," a caraful reading of the document illustrates that all alternatives, and particularly Plan A, appear to exceed the jurisdiction the BLM was granted by the Proclamation. Of special concern for the public's understanding of the CCNM is the BLM coastal zone concept, whose maps and charts make the entire coast appear within the CCNM, when, in reality, it is only rocks and pinnacles above mean high tide that make up the CCNM. Zones are even placed where no rocks or pinnacles exist, making the CCNM appear to be a contiguous entity along the entire coast, including waters surrounding these structures. BLM may not have intended to convey this impression, but several highly educated RFA members who were requested to read the plan concluded that was the BLM's apparent intent, and therefore we conclude that the general public may get the same arroneous impression.

6-E The Plan seems to focus on the protection of seabirds and marine mammals rather than on the physical rocks and pinnacles themselves as resources above mean high tide. Our experience in this area informs us that U.S. Fish and Wildlife Service has responsibility for seabirds and sea otters, and NOAA Fisheries has responsibility for pinnipeds and cetaceans. It is not our intantion to defend the jurisdiction of these federal agencies, but only to point out the above as an example of what appears to be overreach of BLM's jurisdiction, and which ignores the history of the DFG's work with these with federal entities. Our principal concern is how this overreach carries over to waters surrounding the rocks and pinnacles. For example, mussel harvesting is mentioned in several areas as a concern. Rock and shore fisherman oftan take some mussels for bait and food. Mussels are by definition below mean high tide creatures. And as much as we would like to see more and vigorous enforcement on human predation of tidepools along our coast, are not tidapools by definition below mean high tide, and undar tha jurisdiction of the DFG?

Plan A, the Preferred Option, "Balanced Management"

6-F 6-G 6-H Plan A's name is a misnomar. There is nothing balanced about the plan as far wa are concerned as stakeholders. ES.3 Purpose and Need, states, "The RMP is not intended to supersede or materially modify current or future uses of tha adjacent lands, water, or air that are managed by other entities and are subject to existing law and regulation." But Plan A indeed does seek to supersede traditional, and even heritage water recreation, water recreation that attracts millions of Californians and visitors to our shores, and which has an enormous economic multipliar effect on tha State's economy. Plan A's Bullet #2 (2.3.2) states the following as a "balance in objectives": "Support low-impact recreation ('appreciate from afar')." Therefora, tha Plan's main management and law enforcement thrust is to alter and change the recreational on-the-watar activities that wa practice as stakeholders, and seeks to replace them with ill-defined "BLM sponsored recreational activities." Just the definition of low-Impact recreation alone is alarming. "View from Afar"! What does "view from afar" mean? How far? This begins an unending use of vague and broad terms throughout the FMP and EIS, too numerous to cite, curbing or eliminating water activities "adjacent," "naar," "around" the rocks and pinnacles above mean high tide over which the BLM has ownership and compose the CCNM, but whera on-the-water and under-the-water jurisdiction is solely that of tha DFG. In other places the Plan has other statements appropriate to tha BLM's jurisdiction: "Restrict *on-island* recreational activities that would harm the physical resources of the monument" (Implemantation Decisions, Bullet 2, 2-19). Clearly, any Plan raferance to on-the-watar recreational activities inserts the BLM into the DFG's jurisdiction, i.e. the waters "near," "adjacent," "afar," etc.

6-I 6-J While Plan A is short on dafining "afar," "adjacent, "around" etc., it statas clearly that the Plan's first order of business is to manage peopla. "Wildlife Resources," paragraph 3, 2.23, states, "Activities involving management of people would probably be the aasiest to accomplish and have the greatest potential for immediate positive results." Management of people would exclude recreational water activities not considered "low impact," with its vagua, imprecisa definition of "view from afar." In paragraph 2, 2-24, recreational activities not considered low impact, "include, *but are not restricted to*, scuba diving and snorkeling, seaweed collacting, boat traffic (including kayaking), overflights by airplanes, rock climbing, and onshore activities (e.g. fireworks displays) *near sensitive sites*." (Emphasis ours). While this does not outright exclude sportfishing, it establishes a de-facto ban on sportfishing by excluding *the means by which we fish*, i.e. by boat, by kayak, and scuba diving. The phrase "but are not restricted to" opens tha possibility of restricting fishing itself, or other maans of fishing, such as free diving, which often does not use a snorkal, or fishing from shore non-BLM rocks or surf. The real key here is the "near sensitive sites." What constitutes "near," who determines "near," and what methodology is to be used to determine "near"? Nothing is stated. Another key is the word "sensitive," which becomes the leitmotiv justifying the banning of all recreational activities not considered "low impact" ('view from afar'), and in other places "low impact and non invasive" (Recreation, second paragraph, 2-28).

6-K Plan A at this point introduces under "Wildlife Resources" the idea of seasonal restrictions in "sensitive wildlife resource areas" (2-23). "Sensitive" was first introduced much earlier in Chapter 2 under "Law Enforcement" (2-8). The goals of law enforcement coordination will be to "...focus enforcement resources on segments of the coast with the most sensitive biological and cultural resources...." Despite tha redundancy of the word resource, this is a very sensible goal given the well-publicized budgetary problems of California law enforcement agencies, including the DFG.

6-L But this also is precisely the point at which the imbalance in Plan A, Balanced Management, is most clearly revealed. One would expect one of the three principal goal bullets of Plan A, probably bullet 2, to be "Focuses resource protection on known and probable sensitive sites," instead of "Supports low-impact recreation ('appreciate from afar')." "Focuses resource protection on known and probable sensitive sites" is the second bullet found in Alternative C! If traditional water recreational activities need to be curbed or banned, that decision should flow from the siting process since such management measures are to be seasonal and based on determination of "sites hosting significant populations of nesting or resting saabirds, or breeding or resting marine mammals." (2-23). Instead, Plan A emphasizes management of people first, and that management includes on, near, adjacent, afar water recreation, the jurisdiction of the DFG, and not just *on* the rocks and pinnacles abova mean high tide, that are the jurisdiction of the BLM. Plan A features the proverbial cart before the horse. The sensitive site characterization initiative probably should precede the adoption of any plan, but at a minimum, siting of "sensitive" areas should be the key goal of any "Preferred Alternative," and any restrictions affecting on-the-water recreational activities should flow from that process. This principal should be clearly stated in the Plan.

6-M However, the siting initiative itself has a fundamental problem due to the use of the term "sensitive," which is stated to guida the process, and especially when it is applied to birds and sea mammals. A footnote on page 2-8 states that, "Here and elsewhere in this document, the term "sensitive" refers to resources that are particularly prone to degradation from human-related or other disturbance. For some resources, regulatory criteria determine sensitivity; for other resources, use of this term is a *subjective determination* based on the professional judgment of resource specialists." (Emphasis ours). How the term "sensitive" is related to regulatory terms such as "endangered" and "threatened" is not discussed.

6-N 6-O 6-P 6-Q RFA completely rejects "subjective determinations" as a basis for banning boating, diving, kayaking, sportfishing, shore casting, surf casting, or any other on or under-the- water recreational activity. The siting characterization initiative should be conducted with the expertise of tha DFG, USFWS, and NOAA Fisharies, and the determination of which on-the-water activities need to be limited or banned seasonally at specific sites determined by their specialists. There are so many conclusory statements in Plan A and throughout the document that they are impossible to catalog. But as an example, there is discussion about disturbing resting sea lions. Anyone who spends much time on the water would disagree with the statement that sea lions are sensitive or shy creatures easily disturbed by on-the-water recreational activities such as fishing, boating, kayaking, and diving. Anyone who has visited a harbor, or offshore rocks and buoys, such as the moorings for oil tankers just outside to tha south entrance of Marina del Rey, views sea lions sleeping, resting, and undisturbed by the human activities that surround them. They readily approach boats, and even divers. *On* CCNM rocks, pinnacles, and small islands above mean high tide, human activities would no doubt disturb them, and especially birds. That is what the BLM's jurisdiction and responsibilities should focus on, not on-the-water recreational activities. Again, tha sensitiva siting characterization initiative as it affects on-the-water or in-the-water recreational activity must be determined in conjunction with the DFG, USFWS, NOAA Fisheries, and prior to seeking any restrictions of on-the-water recreational activities within the jurisdiction of the DFG and tha regulatory power of the Fish and Game Commission. In addition, the term "sensitive" should be subjected to peer raviaw bafore applying it to management and enforcement decisions. "...For othar resources, usa of this term is a *subjective determination* based on the professional judgment of resource specialists" is unacceptable for management and enforcement decisions that affect the on-the-water recreation of millions of California residents, US citizens and visitors. A subjective determination cannot be allowed to negatively affect the economic multiplier generated by businesses and services that support on-water recreational activities, especially sportfishing.

6-R RFA strongly recommends that bullet 2 in Alternative C replace bullet 2 in Plan A, and that all problems with the siting initiative using the term "sensitive" be resolved in cooperation and consultation with the DFG, USFWS (management authority for seabirds and otters), NOAA Fisheries (management responsibility for pinnipeds and cetaceans), and particularly the DFG, with its expertise in all areas, and experience working with USFWS and

NOAA Fisheries. The Plan does state BLM's intention to work on siting with jurisdictional agencies in "Plan Decisions," paragraph 1, 2-24. However, that statement is immediately followed with paragraph 2 that concludes, even before the "sensitive" siting work is completed, that on-the-water recreation needs to be limited or banned. In other words, the Plan issues yet another conclusory statement before the opinions of the DFG, NOAA Fisheries, and USFWS on the need to ban recreational on-the-water activities seasonally, site by site, is even known! Plan A is fundamentally prejudiced against on-the-water recreational activities based on conclusory statements prior to consultation with agencies and its experts with jurisdiction over wildlife and in-the-water resources. **6-S** If the "sensitive siting" process is done in advance of any consideration of curbing water recreational activities, and this is done in conjunction with the above mentioned governmental entities in an *open public and science based process*, RFA is confident that the BLM will have the support of the sportfishing community. We are conservationists, and honor and love our coastal ecology. The sportfishing community, the recreational stakeholder with the greatest time on the water among all stakeholders, can function as an effective on-the-water and on shore BLM "steward," just as that community functions currently as a watchdog for the DFG by having CALTIP at our fingertips in our cell phones, and by using our VHF radios to report illegal fishing and/or environmental activities. If *on* rock and pinnacle above mean high tide activities, which appear to us to be the most threatening to biota and geologic resources, are clearly banned or limited, trespass and violation are easily distinguished and reported. **6-T**

SUMMARY, LANGUAGE PROBLEMS, AND OMISSIONS

RFA already has cited numerous vague and broad terms relating to on-the-water recreational activities such as "near," "adjacent," and "around" that we want defined or eliminated. And we strongly have recommended that bullet 2 in Plan A be eliminated in favor of bullet 2 in Alternative C. In any case, bullet 2 in Plan A, with its definition of "low impact" as "view from afar," is a term of poetry or art. That phrase has no place in a serious management proposal. We also have requested that conclusory statements regarding the need to seasonally ban on-the-water recreational activities such as boating, kayaking and scuba diving in advance of the "sensitive" siting process, and in advance of the peer review of the term "sensitive," as well as the assertion that "sensitive" may be applied subjectively, be eliminated until the "sensitive" siting process itself determines scientifically if, which, and when on-the-water activities need to be curbed in the interest of seabirds and marine mammals. **(Repeats) 6-J 6-R 6-G 6-S**

Throughout the Draft RMP/Draft EIS there appear words and phrases that create foddar for potential lawsuits to ban sportfishing. We have mentioned some of the terms that lack precise definition and create openings for interpretation. The BLM has a long history of being sued for language in plans that litigious, well-funded organizations have taken advantage of. We request that these be eliminated, changed, or language added which clearly states that the BLM has no intention to institute a *de-facto* ban on sportfishing in all of its manifestations - recreational fishing from boats, from rocks not owned by the BLM, from the surf line, from kayaks, from rubber tubes, or any other way sportfishing traditionally occurs - unless the USFWS, NOAA Fisheries, and most importantly, the DFG, which has jurisdiction over all on-the-water and below mean high tide water resources in California State waters, conclude such bans are absolutely necessary and are applied seasonally on a site-by-site determination. **6-U**

Because objectionable language and conclusory statements appear throughout the Plan, it is impossible to catalog them all. Some provide interpretive ambiguities that could lead to litigation. We thus will concentrate on a number that appear in Chapter 2, some or all of which we perceive as a threat to sportfishing, and which may be the subject of interpretation and possible litigation.

1. Top of Page 2-29, "Other types of recreation activities, such as those with a sporting or competitive emphasis, are already well served in other locations." This is yet another conclusory statement. Eliminate the sentence completely, or add after "...such as those with a sporting or competitive emphasis," not including sportfishing, or with the exception of sportfishing. Sportfishing has a sporting and competitive emphasis. The term Sportfishing is what distinguishes recreational angling and spearfish diving from commercial fishing. Sportfishing is the regulatory term in California. The DFG publishes "Sportfishing" regulations. Sportfishing competitions take place. In a competition, boats spread out and do not concentrate together. To leave that sentence (Top of Page 2-29) in fact is an invitation to litigation. **6-V**

2. Until the Site Characterization Initiative is completed, and each specific site is characterized individually as to the seasonal on or in-the-water recreational activity protections each requires, RFA would like to see sportfishing included among the many listings of water recreational activities considered "low impact". In 3.32.2 "Fishing," first paragraph, the Plan states "While the activity of fishing does not necessarily cause disturbance...," and then goes on speculate that boats may disturb birds and mammals. That is a conclusory statement that may be true at one "sensitive" site, and not at another. Leaving language in the Plan without a clear statement that on-the-water recreational activities are all "low impact" activities, particularly recreational angling in all of its manifestations and means, until it is determined on site-by-site basis whether an on-the-water recreational activity is to be reclassified as too high impact for a given site, is to again leave language open to interpretation and litigation on actions taken or not taken by the BLM and/or its Core Partners. Adding Sportfishing to the list of "low impact" recreational activities, and excluding boating and boat traffic, including kayaking, from "activities with the potential to disturb wildlife", and leaving only those activities that are *on rock or on pinnacle activities above mean high tide*, clearly high impact activities and within the BLM jurisdiction, will assuage the fears and suspicions of sportfishers that they may be victimized by "subjective determinations," and the plethora of conclusory statements in the Drafts. **6-W**

3. Add to references to kayaking, fishing. Kayak fishing is the fastest growing area of saltwater angling with its own culture, and an ethic of catch and release and selective targeting of trophy fish. A kayak limits take by virtue of it storage capacity. "Kayaking" stands alone in the lists, while power boating includes fishing. "Fishing" in all lists of on-the-water activities should follow kayaking. **6-X**

4. 2-29, Plan Decisions, bullet 2: Add sportfishing to "Low-impact forms of recreation…"water sports" (e.g. fishing from boats and kayaks, swimming, sailing). **6-Y**

Thank you your consideration,

Jim Martin

Jim Martin
West Coast Rägional Director, RFA
PO Box 2420
Fort Bragg, CA 95437
Tel: 707-964-8326

Frederick A. Hollander, Ph.D.

Frederick Hollander, Ph.D.
Board Member, RFASoCal
2032 6th St.
Santa Monica, CA 90405
Tel: 310-396-2630

CC: Ryan Brodderick, Director, California Department of Fish & Game
CC: Robert R. Treanor, Executive Director, California Fish & Game Commission
CC: Rodney McInnis, Southwest Regional Administrator, NOAA Fisheries
CC: Dr. Donald McIssac, Executive Director, Pacific Fishery Management Council

⑦

Rodezz@aol.com
10/11/2004 09:40 PM

To: cacnm@ca.blm.gov
cc:
Subject: Recreational Fishing

Dear Sirs:

In regard to recreational fishing along the California coast, this activity has a very low impact on fishing stocks, especially with the current regulations that establish closed seasons and limited takes. These restrictions when combined with the benefits to the resource as a result of taxes funding habitat restoration and species propagatin makes any recreational closure very counterproductive. 7-A

Our ocean and shore is a renewable resource that we should be using in a manner that all can enjoy. Multipurpose management is the solution to preserving our resources, rather than denying access.

Thank you for your consideration and thoughtful planning.

Sincerely,

Matthew Rode
408-267-0767

MLML Mtg.
10/14/04

⑧

California Coastal National Monument
RMP Response Form

For public input on the Draft California Coastal National Monument Resource Management Plan and Draft Environmental Impact Statement

Note: All items must be completed for form to be accepted Today's Date: 10-14-04

Your name (please print): Howard Egan

Representing (put an X in one box only):

☐ Self only

☒ Business, organization or agency (specify): Recreational Fishing Alliance

Address: 219 Elina Street

City: Capitola CA

State: ___ Zip: 95010 Phone: 440-2915

Email (optional): Howa @ Hown. net

Important Privacy Notice: Under the Freedom of Information Act, all written comments, including names and street addresses, will be available for public review upon request and may be published by the BLM during the planning process. As an individual, however, you can ask us to withhold your name and address. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety. If you checked "self only" above, and would like us to withhold your name, put an X in this box: ☐

Comments on the California Coastal National Monument Draft RMP/Draft EIS:

See Submittal.

Mail form to:
California Coastal National Monument
299 Foam Street
Mooterey, CA 93940

Or Fax to: (831) 647-4244

Continue your comments on the back of this page, or on additional pages

Testimony of:

Howard Egan
Sanctuary Affairs Coordinator for
The Recreational Fishing Alliance RFA
219 Elinor Street
Capitola, CA
howa@howa.net

I'm Howard Egan, and I'm a Monterey Bay recreational fisherman. I'm also a member of the Monterey Bay Marine Sanctuary Advisory Council, and I'm the Sanctuary Affairs Coordinator for the West Coast Region of the Recreational Fishing Alliance, RFA. I'm speaking on behalf of the RFA and the thousands of members of its affiliated central California fishing clubs.

The RFA is a national grassroots organization dedicated to conservation and protecting the rights of recreational fisherman.

The California Coastal National Monument as proclaimed appears to have very little to do with the preferred alternative (A), or any of the other two action alternatives (B and C) for that matter. The vast majority of the rocks that might fall under the monument require no additional protection whatsoever in order to achieve the goals of the proclamation. To imply otherwise is simply misleading an unsuspecting public that may not understand the true dynamics of the ocean and just how naturally protected these rocks already are. 8-A

In a single sentence paragraph, thus intended to have special emphasis, the act states as follows: 8-B

The establishment of this monument is subject to valid existing rights. 8-B

In all cases, there is the pre-existing right to fish, surf, and generally recreate adjacent to these rocks and islands. Additionally, the right to manage these activities already lies within other state and federal agencies. 8-C

All of the action alternatives seek to abrogate this right, in direct violation of the proclamation itself. 8-B

With respect to the preferred alternative, the "Balanced Management Alternative": We see nothing balanced about this alternative. **ES.3 Purpose and Need, states**, "The RMP is not intended to supersede or materially modify current or future uses of the adjacent lands, water, or air that are managed by other entities and are subject to existing law and regulation." But Plan A indeed does seek to supersede traditional, and even heritage water recreation, water recreation that attracts millions of Californians and visitors to our shores, and which has an enormous economic multiplier effect on the State's economy. Plan A's Bullet #2 (2.3.2) states the following as a "balance in objectives": "Support low-impact recreation ('appreciate from afar')." 8-D

Again, this is further evidence that the alternatives proposed are not only in conflict with the proclamation, but the RMP itself.

Throughout the Draft RMP/Draft EIS there appear words and phrases that create fodder for potential lawsuits to ban sportfishing. We have mentioned some of the terms that lack precise definition and create openings for interpretation. The BLM has a long history of being sued for language in plans that litigious, well-funded organizations have taken advantage of. 8-E We request that these be eliminated, changed, or language added which clearly states that the BLM has no intention to institute a *de-facto* ban on 8-F sportfishing in all of its manifestations - recreational fishing from boats, from rocks not owned by the BLM, from the surf line, from kayaks, from rubber tubes, or any other way sportfishing traditionally occurs - unless the USFWS, NOAA Fisheries, and most importantly, the DFG, which has jurisdiction over all on-the-water and below mean high tide water resources in California State waters, conclude such bans are absolutely necessary and are applied seasonally on a site-by-site determination. 8-F

The RFA has submitted a detailed review of the draft RMP and draft EIS. 8-G

As written, the plans are so fundamentally flawed that the best way to proceed is to start over with an actual public scoping process, and with the intent to adhere to the letter and the spirit of the proclamation, none of which appears to have occurred. 8-H

We urge you to add recreational fishing to the list of low impact recreational activities supported by the monuments Resource Management Plan, thus adhering to the proclamation itself. 8-I

Thank You.

---

⑨

tlima25@att.net
10/17/2004 11:53 AM

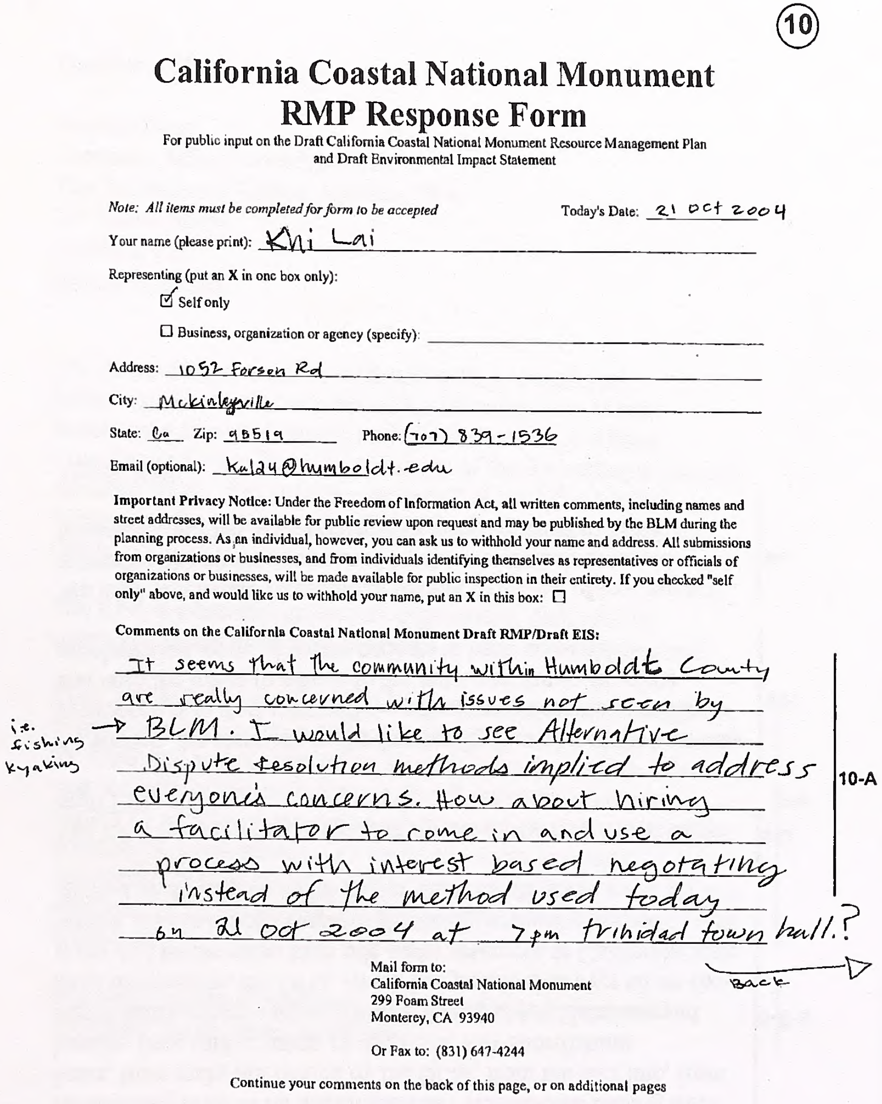
To: cacnm@ca.blm.gov
cc:
Subject: Public Comment CCNM

To whom it may concern;

The idea of protecting the outlying rocks, reefs, and unowned islands along the California coast is an admirable one. As a California coastal native and sailor, diver, surfer, and fisherman for more than 40 years I am also in favor of maintaining the coast in a wild and pristine condition. However I ask that you go slow and careful when considering restricting access to these areas to kayakers, divers, (Abalone and scuba) and surfers. Many times an abalone diver would haul himself out on a rock to catch his (or her) breath to avoid fatigue and possible drowning. One of the Kayak's advantages is to be able to silently approch wildlife and observe, photograph, and appriciate it. The surfer and fisherman love and need clean and uncrowded areas to enjoy their persuits. Will a fisherman be in violation of the law if he fishes too close to his favorite rock reef? Will the Abalone diver be in violation of the law for hanging onto an outlying rock while a large set of waves passes? How close can you drop and anchor in the lee of a outlaying reef to ride out a blow that would otherwise put people in danger? These people love and respect the sea and coast of California and are some of conservations closest allies and need to be remembered when drafting regulations to achive your goals. All of us want to protect what we have and pass it on to the next genaration, but we also don't want to be made into criminals for enjoying our California home. 9-A

Thank you for taking the time to listen to my concerns.

Tom Lima, tlima25@att.net



⑩

California Coastal National Monument
RMP Response Form

For public input on the Draft California Coastal National Monument Resource Management Plan and Draft Environmental Impact Statement

Note: All items must be completed for form to be accepted

Today's Date: 21 Oct 2004

Your name (please print): Khi Lai

Representing (put an X in one box only):

☑ Self only

☐ Business, organization or agency (specify):

Address: 1052 Forson Rd

City: Mckinleyville

State: Ca Zip: 95519 Phone: (707) 839-1536

Email (optional): kul24@humboldt.edu

Important Privacy Notice: Under the Freedom of Information Act, all written comments, including names and street addresses, will be available for public review upon request and may be published by the BLM during the planning process. As an individual, however, you can ask us to withhold your name and address. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety. If you checked "self only" above, and would like us to withhold your name, put an X in this box: ☐

Comments on the California Coastal National Monument Draft RMP/Draft EIS:

It seems that the community within Humboldt County are really concerned with issues not seen by BLM. I would like to see Alternative Dispute resolution methods implied to address everyone's concerns. How about hiring a facilitator to come in and use a process with interest based negotiating instead of the method used today on 21 Oct 2004 at 7pm trinidad town hall.? 10-A

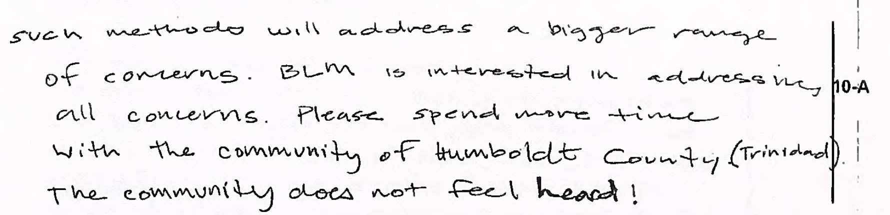
i.e. fishing kyaking

Back

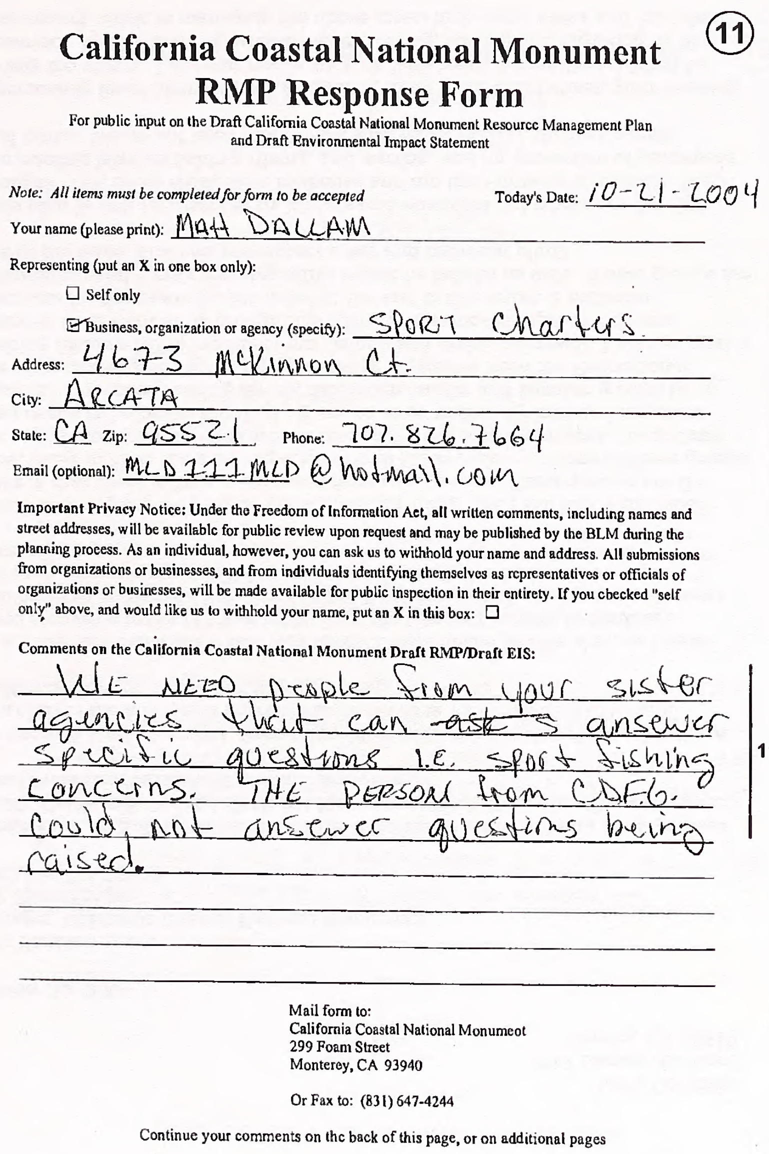
Mail form to:
California Coastal National Monument
299 Foam Street
Monterey, CA 93940

Or Fax to: (831) 647-4244

Continue your comments on the back of this page, or on additional pages



such methods will address a bigger range of concerns. BLM is interested in addressing all concerns. Please spend more time with the community of Humboldt County (Trinidad). The community does not feel heard! 10-A



⑪

California Coastal National Monument RMP Response Form

For public input on the Draft California Coastal National Monument Resourcc Management Plan and Draft Environmental Impact Statement

Note: All items must be completed for form to be accepted Today's Date: 10-21-2004

Your name (please print): Matt DALLAM

Representing (put an X in one box only):

☐ Self only

☒ Business, organization or agency (specify): SPORT Charters.

Address: 4673 McKinnon Ct.

City: ARCATA

State: CA Zip: 95521 Phone: 707.826.7664

Email (optional): MLD111MLD@hotmail.com

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Comments on the California Coastal National Monument Draft RMP/Draft EIS:

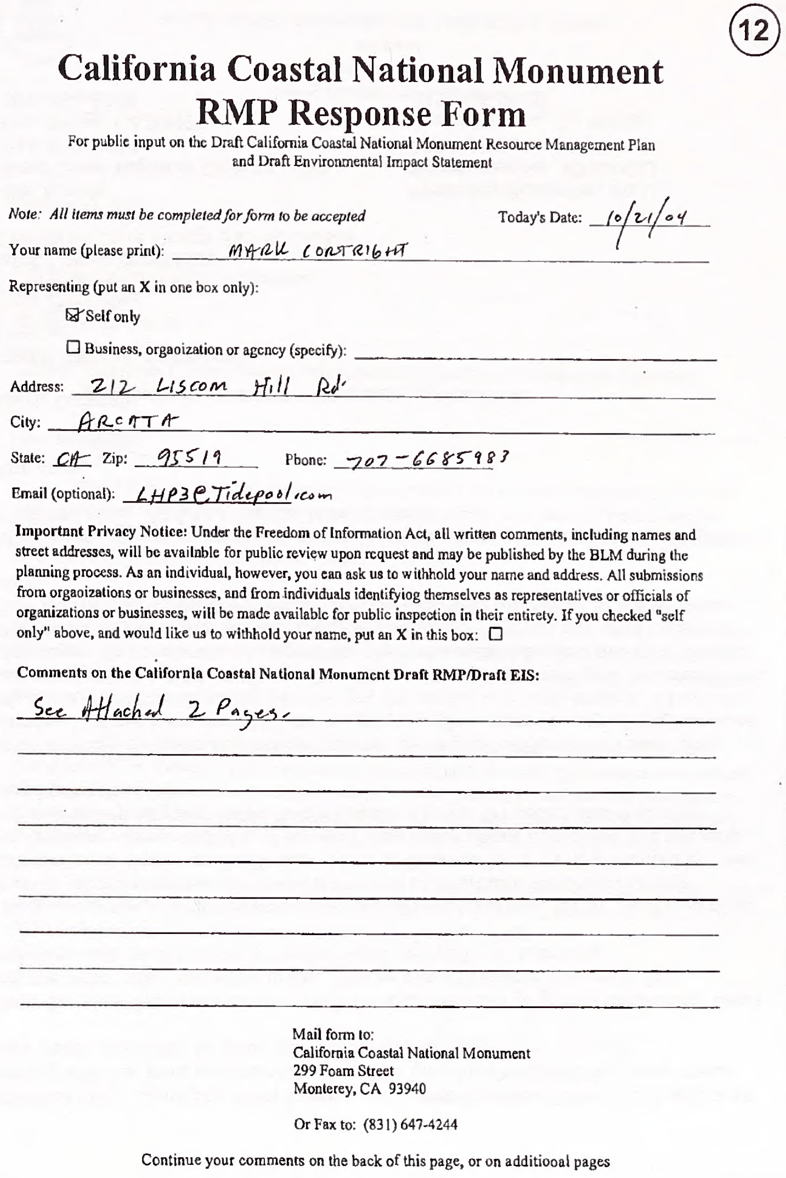
WE NEED people from your sister agencies that can ~~ask~~ s ansewer specific questions I.E. sport fishing concerns. THE PERSON from C.D.F.G. could not ansewer questions being raised.

11-A

Mail form to:
California Coastal National Monumeot
299 Foam Street
Monterey, CA 93940

Or Fax to: (831) 647-4244

Continue your comments on the back of this page, or on additional pages



⑫

California Coastal National Monument RMP Response Form

For public input on the Draft California Coastal National Monument Resource Management Plan and Draft Environmental Impact Statement

Note: All items must be completed for form to be accepted Today's Date: 10/21/04

Your name (please print): MARK CORTRIGHT

Representing (put an X in one box only):

☒ Self only

☐ Business, orgaoization or agency (specify):

Address: 212 LISCOM Hill Rd.

City: ARCATA

State: CA Zip: 95519 Phone: 707-6685983

Email (optional): LHP3@Tidepool.com

Importnnt Privacy Notice: Under the Freedom of Information Act, all written comments, including names and street addresses, will be availnble for public review upon request and may be published by the BLM during the planning process. As an individual, however, you can ask us to withhold your name and address. All submissions from orgaoizations or businesses, and from individuals identifyiog themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety. If you checked "self only" above, and would like us to withhold your name, put an X in this box: ☐

Comments on the California Coastal National Monument Draft RMP/Draft EIS:

See Attached 2 Pages.

Mail form to:
California Coastal National Monument
299 Foam Street
Monterey, CA 93940

Or Fax to: (831) 647-4244

Continue your comments on the back of this page, or on additiooal pages

Mark Cortright
212 Liscom Hill Road
Arcata, CA 95519

October 20, 2004

Rick Hanks
Manager, California Coastal National Monument
299 Foam Street,
Monterey, CA 93940

Comments on U.S. Department of the Interior, Bureau of Land Management (BLM), California Coastal National Monument Draft Resource Management Plan/Draft Environmental Impact Statement

My name is Mark Cortright, former President of Humboldt Skindivers, the oldest dive club in the state, and current Far-North Area Vice President of Central California Council of Diving Clubs (CenCal).

As a diver and fisherman I feel very much a stakeholder in this plan, as I have dived alongside many of these rocks from the Channel Islands in Southern California to Southwest Seal Rock in the Northern section. In the past 25 years I've seen many changes to this environment, mostly from an underwater perspective.

After reviewing the 1-1/4 inch thick plan, the thing that I feel needs the most work is that there is little to no input from user groups. These groups are the most likely to have the most experience with these rocks, yet none of these groups are even mentioned, or were ever contacted for the scoping process. Your Draft plan needs to be better rounded. It seems to be written by bird and mammal experts. How about letting divers, fisherman, surfer and kayaker groups in on the planning stages? May I suggest letting a member from the Recreational Fishing Alliance (RFA) represent our fishing and diving interests? I also suggest a member from CenCal be brought on board to specifically represent divers. Contacts for these groups are listed at the end of this letter. A Surfrider Foundation and Kayak representative would be helpful as well. If user groups are not at the table, how can you expect a fair and balanced plan? 12-A

This plan is well represented by birders and scientists but where are the user groups? Yes, some rocks have rookeries and are haul-outs for mammals. There are existing laws on fishing, diving, and surfing, and for protection of pinnapeds and birds. We do not need more. And who would enforce the new ones? 12-B

I personally favor Alternative C. However, in all three alternatives, your wording is way too vague. I suggest words such as "adjacent", "around" and "afar" be removed. I want to see sport-fishing and diving, surfing and kayaking all listed as low-impact. Stick to managing the above mean high water areas and "on Island" activities only. Leave the other areas to the other agencies already in charge with dealing with the laws and enforcement. For instance, mussels live below mean high water, and have no place in your management plan. 12-C 12-D 12-E 12-F

State the sensitive areas clearly, such as rookeries and pupping/haul-outs. Don't use the term "near" sensitive areas. Please focus on above-the-water line activities, not on-the-water or in-the-water recreational activities. 12-G

I suggest you key in on the important rookeries and specify them. You also need to split your management into different areas. Southern California is very different than Northern California. Most of these rocks are self-protected by their very nature - steep-walled and covered with razor-sharp barnacles and mussels, not to mention slippery kelp. Some common sense is needed about simple management. 12-H

Your wording needs to be changed. In my 1200 plus scuba dives I have been harassed by sea lions over 100 times, yet your plan seems to say diving harasses sea lions. I take underwater photos, yet I'm considered high-impact. I have the same impact as a bird watcher with a camera, yet bird watching is not considered high-impact? 12-I I understand part of the plan was subcontracted out to a biologist who is one of the top birdwatchers in the country. You can not get a balanced view from that. If balance is your objective, get user groups in at the planning table.

Allow user groups to input and shape this plan for all. That way you will get a balanced plan. And as a bonus, less lawsuits! 12-J

Sincerely,

Mark Cortright

USER GROUP CONTACTS:

CenCal
P.O. Box 779,
Daly City, CA 94017
http://www.cencal.org
President Steve Campi 925-932-8838

Jim Martin
West Coast Regional Director, RFA
P.O. Box 2420
Fort Bragg, CA 95437
707-964-8326

Frederick Hollander, Ph.D.
Board Member, RFASoCal
2032 6th St.
Santa Monica, CA 90405
310-396-2630

California Coastal National Monument RMP Response Form

(13)

For public input on the Draft California Coastal National Monument Resource Management Plan and Draft Environmental Impact Statement

Note: All items must be completed for form to be accepted

Today's Date: 10/21/04

Your name (please print): ROSS TAYLOR

Representing (put an X in one box only):

☒ Self only

☐ Business, organization or agency (specify):

Address: 1254 QUAIL RUN CT.

City: MCKINLEYVILLE

State: CA Zip: 95519 Phone: (707)-839-5022

Email (optional):

Important Privacy Notice: Under the Freedom of Information Act, all written comments, including names and street addresses, will be available for public review upon request and may be published by the BLM during the planning process. As an individual, however, you can ask us to withhold your name and address. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety. If you checked "self only" above, and would like us to withhold your name, put an X in this box: ☐

Comments on the California Coastal National Monument Draft RMP/Draft EIS:

POWER PT SPENT TOO MUCH TIME ON INTRO, AND LACKED DETAILS ON THE ALTERNATIVES. ESPECIALLY HOW THE ALTERNATIVES WOULD BE IMPLEMENTED → THIS WAS SEVERELY LACKING. 13-A

103 → I WOULD LIKE A HARDCOPY OF THE PLAN TO READ + SUBMIT WRITTEN COMMENTS

Mail form to:
California Coastal National Monument
299 Foam Street
Monterey, CA 93940

Or Fax to: (831) 647-4244

Continue your comments on the back of this page, or on additional pages

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

(14)

October 22, 2004

Herrick Hanks
California Coastal National Monument
299 Foam Street
Monterey, CA 93940

Subject: California Coastal National Monument Draft Resource Management Plan/Draft Environmental Impact Statement (DEIS) [CEQ #040435]

Dear Mr. Hanks:

The U.S. Environmental Protection Agency (EPA) has reviewed the above referenced document. Our review and comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementation Regulations at 40 CFR 1500-1508, and Section 309 of the Clean Air Act.

The DEIS evaluates alternatives for managing the new California Coastal National Monument, which includes more than 20,000 rocks, small islands, exposed reefs, and pinnacles along the 1,100-mile length of the California coastline. The alternatives evaluated in the DEIS include the No Action, Balanced Management, Resource Protection Emphasis, and Recreation Opportunity Emphasis alternatives.

Under the Proposed Action, the Balanced Management Alternative, environmental resources will be protected while recreation, education, and research opportunities are provided. We support the proposed monitoring and adaptive management, as well as close inter-agency coordination, which are essential elements of your management proposal. We have rated this DEIS as LO -- Lack of Objections (see enclosed "Summary of Rating Definitions"). 14-A

We appreciate the opportunity to review this DEIS and request a copy of the FEIS when it is filed with our Washington, D.C. office. If you have any questions, please call me at (415) 972-3854, or have your staff call Jeanne Geselbracht at (415) 972-3853.

Sincerely,

Lisa B. Hanf

Lisa B. Hanf, Manager
Federal Activities Office

Printed on Recycled Paper

003958

Enclosure: "Summary of Rating Definitions"

cc: Resource Agency of California
California Department of Fish and Game
California Department of Parks and Recreation

SUMMARY OF EPA RATING DEFINITIONS

This rating system was developed as a means to summarize EPA's level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the EIS.

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

ADEQUACY OF THE IMPACT STATEMENT

Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

Kokatat
water
sportswear

⑮

10/22/04

Rick Hanks
Manager
CA Coastal National Monument
299 Foam St.
Monterey, CA 93940

RE: Comments on the Draft RMP for CCNM

Dear Mr. Hanks,

Thank you for your presentation recently in Trinidad. Like many that attended, I came because I had read sections in the RMP that indicated that on-water activities would be restricted.

This letter is intended to represent both myself as an individual, and my business. As an individual, I am a kayaker and a recreational sport fisherman. I am also Vice President of Kokatat, Inc., a multimillion-dollar company located in Arcata that manufactures specialized clothing and accessories "for people who work and play on the water". We are the market leader in North America for paddling clothing, and under contract, have provided the entire US Coast Guard with drysuits for the last five years (over 10,000 drysuits). We are therefore one of the thousands of companies whose business is directly affected by recreational activities along the California coast.

I appreciated seeing your response to the RFA and that you have invited them to come to the table. I have skimmed the Executive Summary and, per your suggestion, focused my attention on Alternative A.

Notwithstanding the statements in the RMP, and your repeated reassurances, that "BLM jurisdiction does not extend to the ocean...surrounding the coastal rocks and islands" and that the CCNM is the portion "*above* mean high tide" and that fishing "activities are not within the CCNM", language currently in the RMP countervails those statements. On page 2-24, second paragraph it states: "...BLM would...restrict access on *and around* the sensitive areas during known nesting and pupping seasons." and "Activities that should be closely managed during seasonal restrictions would include, but are not restricted to, scuba diving and snorkeling, seaweed collecting, boat traffic (including kayaking)..." Further, pupping and nesting seasons listed in

15-A

5350 Ericson Way • Arcata, CA 95521 • 800-225-9749 • 707-822-7621
FAX 707-822-8481 • email: kokatat@kokatat.com • Website: www.kokatat.com

Rick Hanks
CCNM
10/22/04
Pg. 2

Table 2-6 cover the entire year! This section is responsible for the great majority of the concern because it clearly indicates that BLM will control boating and other in-water activities, as opposed to activities on the monument lands themselves (ie above mean high tide). My suggestions are as follows:

1. Rewrite the above mentioned paragraph:
   Following identification of sensitive wildlife resources areas, BLM would take action to restrict access on, and encourage other agencies with legal jurisdiction to manage access around (1) the sensitive areas during the height of (2) known nesting and pupping seasons. Exceptions for access would be made only in conjunction with local knowledge of marine bird and mammal use, existing and potential use conflicts, and enforcement considerations. ~~Activities that should be closely managed during seasonal restrictions would include all activities with the potential to disturb wildlife habitat. These activities include, but are not restricted to, scuba diving and snorkeling, seaweed collecting, boat traffic (including kayaking), overflights by airplanes, rock climbing, and onshore activities (e.g., fireworks displays) near sensitive sites.~~(3) Restrictions would be implemented seasonally, based on the known nesting and pupping seasons for marine birds and mammals. ~~These seasonal restrictions~~ (4) These seasons are identified in Table 2-6. In addition to supporting enforcement of the seasonal restrictions, site-specific management may be implemented by BLM and its core managing partners on these sites and elsewhere as identified in the implementation actions below.

15-A

(1) Make it clear that BLM can only restrict access ON the monument and it is up to others to manage AROUND. **15-B**

(2) Table 2-6 identifies every month except January and February as one or another critter's nesting or pupping season, and then adds a footnote that the season should be further expanded to include courtship and nest establishment times. It's WAY too broad. (Let me guess; written by a birder?) **15-C**

(3) If complete removal of this section seems impossible, how about: "Activities that should be closely managed ***by agencies with legal jurisdiction*** during seasonal restrictions would include all activities with the potential to disturb wildlife ***habitat***. [It was explained at the meeting that BLM's charge is the HABITAT, not the critters] These activities include, but are not restricted to, scuba diving and snorkeling, seaweed collecting, boat traffic (including kayaking), ... **15-D**

Rick Hanks
CCNM
10/22/04
Pg. 3

(4) Table 2-6 should not be confused as a list of seasonal *restrictions*, but rather as simply a list of seasons. 15-C

15-E

2. On page 2-29, Plan Decisions, first bullet, include "fishing" under "appropriate water sports".

3. I have been told, but could not find myself, that there is mention of mussel taking and seaweed gathering in the document. These are both activities that occur just outside the borders of the monument, as they are below mean high tide. Remove these references; they belong in a different agency's jurisdiction. 15-F

4. Establish at least three geographic management zones for the monument and allow for different management in each. Managing the rocks off Trinidad in the same way as the rocks off La Jolla Cove is sort of like trying to manage Joshua Tree and Redwood National Park the same way. 15-G

5. In section 2-13, 2.3.2, remove "appreciate from afar". Or clarify that this means that the interpretive signage etc for the monument would be "afar" (ie on the shore), but one could still paddle a kayak up and "appreciate from aclose". 15-H

In summary, I think that what worries folks came through loud and clear in Trinidad: we don't want no-go buffer zones in the water around the rocks. Eliminate language in the RMP that refers to or implies this and concern will be greatly diminished. 15-I

There is no statewide sea kayaking organization, only local groups and clubs. Kokatat is however a member of the Trade Association of Paddle Sports (TAPS), a national trade organization. If our further involvement in the development of the RMP would be helpful, please don't hesitate to call.

Sincerely

Kit Mann
Vice President

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(16)

California Coastal National Monument
RMP Response Form

For public input on the Draft California Coastal National Monument Resource Management Plan and Draft Environmental Impact Statement

Note: All items must be completed for form to be accepted Today's Date: 10-22-04

Your name (please print): Michael J Zorbani

Representing (put an X in one box only):

☐ Self only

☒ Business, organization or agency (specify): Lucky 50 (Commercial Fishing operation)

Address: 1341 Bel Nor Rd ~~Mckinleyville~~

City: Mckinleyville

State: CA Zip: 95519 Phone: 707-839-0930

Email (optional): ______

Important Privacy Notice: Under the Freedom of Information Act, all written comments, including names and street addresses, will be available for public review upon request and may be published by the BLM during the planning process. As an individual, however, you can ask us to withhold your name and address. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety. If you checked "self only" above, and would like us to withhold your name, put an X in this box: ☐

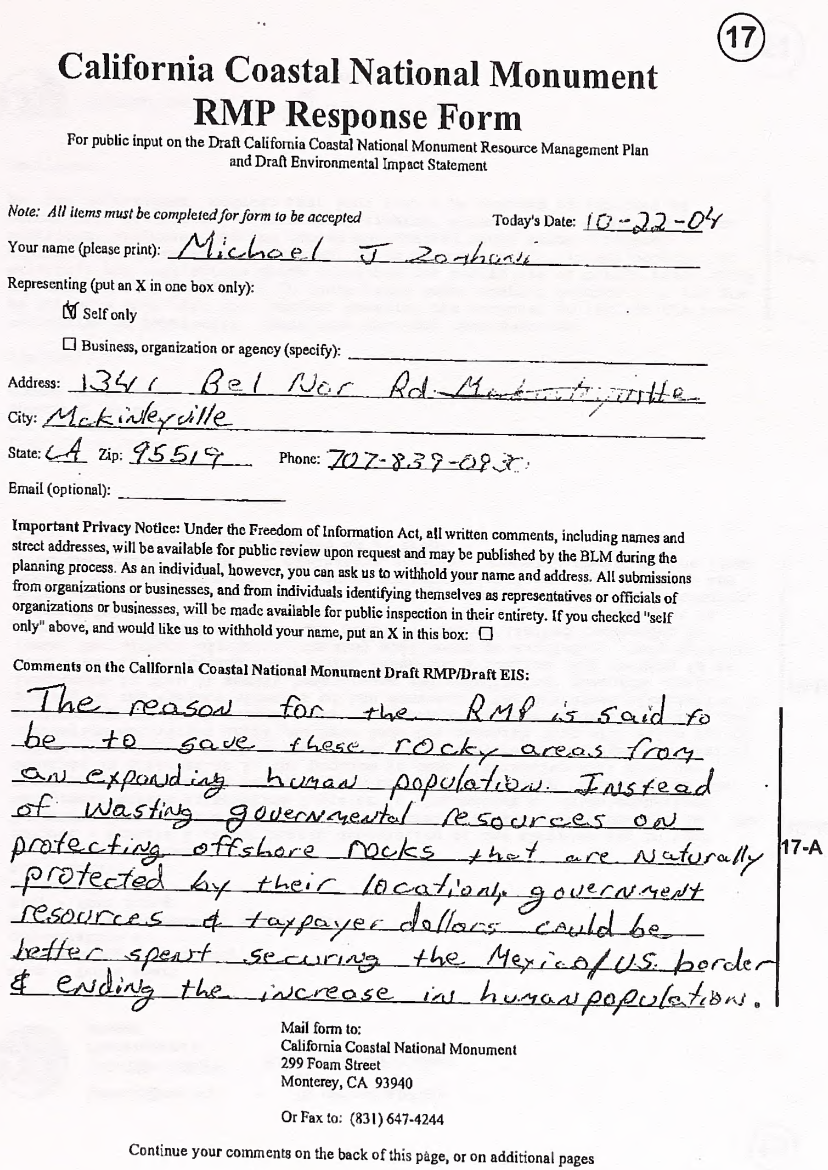
Comments on the California Coastal National Monument Draft RMP/Draft EIS:

In section ES.4.3 the RMP states "these actions will be closely coordinated with the DFG and its MLPA plans." If the RMP deals only with exposed Rocks how is its coordinated with the MLPA which mandates Marine reserves? I view the MLPA as the biggest threat to the future of the commercial Fishing industry. Please strike all mention of the MLPA in the RMP. 16-A

Mail form to:
California Coastal National Monument
299 Foam Street
Monterey, CA 93940

Or Fax to: (831) 647-4244

Continue your comments on the back of this page, or on additional pages



(17)

California Coastal National Monument RMP Response Form

For public input on the Draft California Coastal National Monument Resource Management Plan and Draft Environmental Impact Statement

Note: All items must be completed for form to be accepted

Today's Date: 10-22-04

Your name (please print): Michael J Zonhani

Representing (put an X in one box only):

☑ Self only

☐ Business, organization or agency (specify):

Address: 1341 Bel Nor Rd ~~Mckinleyville~~

City: Mckinleyville

State: CA Zip: 95519 Phone: 707-839-093

Email (optional):

Important Privacy Notice: Under the Freedom of Information Act, all written comments, including names and street addresses, will be available for public review upon request and may be published by the BLM during the planning process. As an individual, however, you can ask us to withhold your name and address. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety. If you checked "self only" above, and would like us to withhold your name, put an X in this box: ☐

Comments on the California Coastal National Monument Draft RMP/Draft EIS:

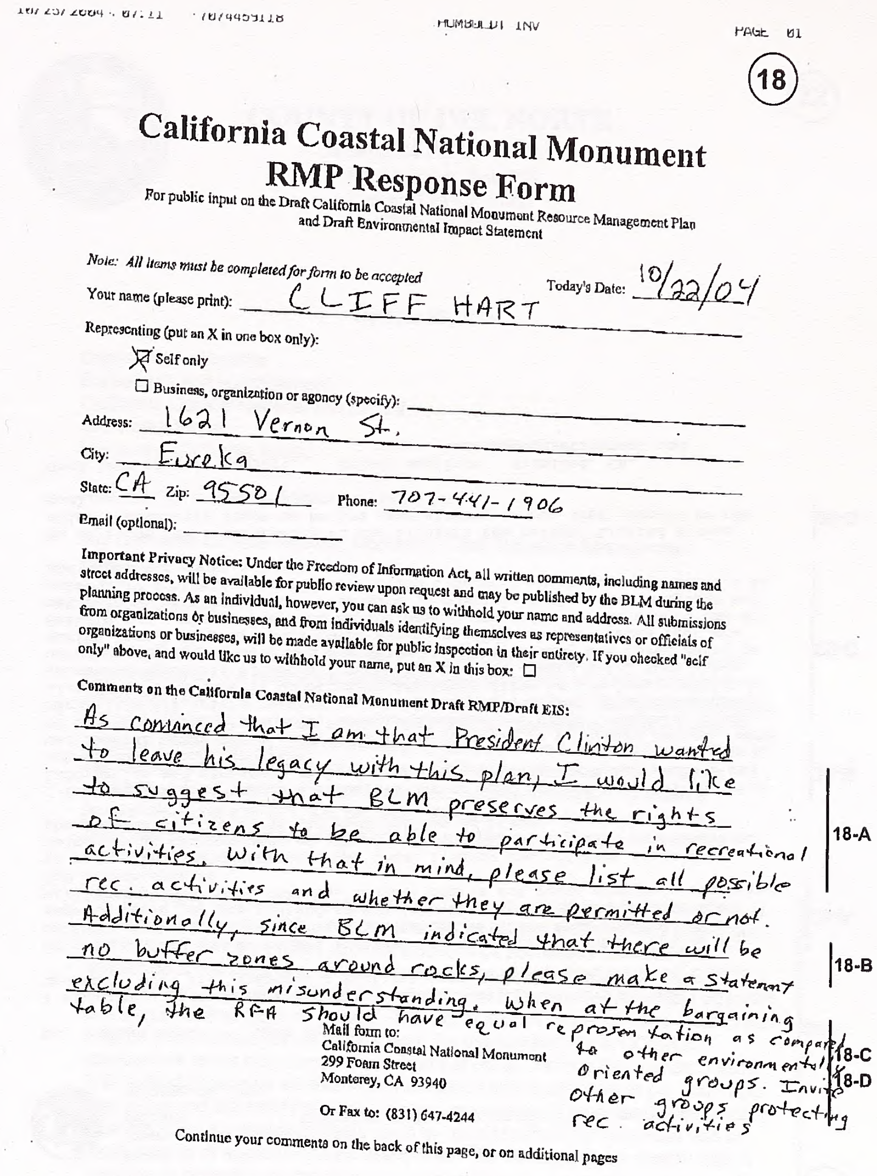
The reason for the RMP is said to be to save these rocky areas from an expanding human population. Instead of wasting governmental resources on protecting offshore rocks that are naturally protected by their location, government resources & taxpayer dollars could be better spent securing the Mexico/US border & ending the increase in human population.

17-A

Mail form to:
California Coastal National Monument
299 Foam Street
Monterey, CA 93940

Or Fax to: (831) 647-4244

Continue your comments on the back of this page, or on additional pages



10/23/2004 07:11 7074459118 HUMBOLDT INV PAGE 01

(18)

California Coastal National Monument RMP Response Form

For public input on the Draft California Coastal National Monument Resource Management Plan and Draft Environmental Impact Statement

Note: All items must be completed for form to be accepted

Today's Date: 10/22/04

Your name (please print): CLIFF HART

Representing (put an X in one box only):

☒ Self only

☐ Business, organization or agency (specify):

Address: 1621 Vernon St.

City: Eureka

State: CA Zip: 95501 Phone: 707-441-1906

Email (optional):

Important Privacy Notice: Under the Freedom of Information Act, all written comments, including names and street addresses, will be available for public review upon request and may be published by the BLM during the planning process. As an individual, however, you can ask us to withhold your name and address. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety. If you checked "self only" above, and would like us to withhold your name, put an X in this box: ☐

Comments on the California Coastal National Monument Draft RMP/Draft EIS:

As convinced that I am that President Clinton wanted to leave his legacy with this plan, I would like to suggest that BLM preserves the rights of citizens to be able to participate in recreational activities. With that in mind, please list all possible rec. activities and whether they are permitted or not.

18-A

Additionally, since BLM indicated that there will be no buffer zones around rocks, please make a statement excluding this misunderstanding.

18-B

When at the bargaining table, the RFA should have equal representation as compared to other environmentally oriented groups.

18-C

Invite other groups protecting rec. activities

18-D

Mail form to:
California Coastal National Monument
299 Foam Street
Monterey, CA 93940

Or Fax to: (831) 647-4244

Continue your comments on the back of this page, or on additional pages

19

wrismart@mcn.org
10/22/2004 03:26 PM
Please respond to
wrismart

To: cacnm@ca.blm.gov
cc:
Subject: Draft RMP Feedback

name = Tanya Smart
representing = Self Only
organization =
address = 17660 Redwood Springs Drive
city = Fort Bragg
state = CA
zip = 95437
email = wrismart@mcn.org

comment = Despite a rather biased description of the alternatives in your Executive Summary, I disagree with BLM's preferred action alternative (A). The management action alternative I prefer is Alternative B, which emphasizes resource protection and research. I'm not against limited recreation as you describe in Alternative A, the problem is that alternative will open use before necessary research is completed. You simply cannot manage even limited recreation activities until you have done the research that will allow you to monitor impacts in an accurate way. Too much is unknown about the ecology and biology of the various elements of the Monument. The preferred alternative is inadequate in that it merely "encourages and coordinates" research, rather than actively conducting and funding research. I realize that funding is an issue, but without directive, funding will never be available. Very briefly, research should be emphasized and completed before limited recreation is allowed for two reasons: One, the research potential of this monument is priceless and not taking advantage of such an opportunity would be a tragedy. Second, once the Monument is impacted by recreational use, the accuracy and potential value of research diminishes greatly. Research should be the first priority, not merely acknowledged as a "need". 19-A 19-B

Submit = Submit

20

Melody
<bearsamongus@tidepool.com>
10/23/2004 04:36 PM

To: <cacnm@ca.blm.gov>
cc:
Subject: Re: public comment on coastal national monument

To Richard Hanks - CCNM Manager

I attended a portion of the public comment meeting in Trinidad, CA. on Thursday Oct. 21. Thanks for your patience with the 'heckler'.

While my family and I are not involved in commercial or sport fishing or offshore recreation, we do observe offshore wildlife from onshore, on a regular basis and are pleased at the idea that the Coastal Monument Plan will make people aware that the coastal stacks and rocks provide a sanctuary for marine species. 20-A

We understand the concerns of our local fishing and offshore recreation neighbors at the prospect of additional regulations. I feel you addressed the problem well to those who were willing to listen.

I feel eduation is the most effective way to help protect these sites, with information and reminders at lookouts, beach parking areas and harbors and school educational programs. 20-B

Our coastal community already uses these programs to a certain extent. Many of us who observe the stacks, rocks and waters for birds , mammals, other marinelife and spills regularily, feel we have somewhat of a guardianship already at work that is unobtrusive and inoffensive to the local people whose livelyhood is offshore. Granted, many sad events still take place unobserved...but we have had successes, such as calling the Coast Guard to remind them ' they are performing exercises over or near stacks that are Seabird nest colony sites and Marine Mammal rookeries at the moment and are making a major disturbance' , calling in possible fuelspills, dumpings and personally contacting people disturbing tidepools, birdsites and mammals in and about the rocks and water. 20-C

We say, the least disurbance to the wildlife the better. Limited access, which fortunately seems to be the case already in our area, should be the goal. 20-D

Good luck on your project, Melody Hamilton Trinidad, CA.
bearsamongus@tidepool.com

(21)

rrod@psnw.com
10/25/2004 05:57 PM

To: cacnm@ca.blm.gov
cc:
Subject: BLM Monument Plan

Gentlemen:

We, the undersigned, request that your Plan A be amended to included as permissable activities, recreational fishing, clamming, and other low impact activites, including walking access to affected beach areas, tidepool exploration and related activities. It is unconscionable, in our openion, to entertain any regulations which would bar the public use of public lands along the coastline of California in those areas under control authority of the BLM. We strongly urge that you consider amending the proposal to include the above activities as permissble. thank yhou for your consideration. 21-A

Sincerely,

Rodney A. Reindl
Sharon K. Reindl
Mark J. Reindl
Kathrybn M. Reindl

---

(22)

COUNTY OF DEL NORTE
Board of Supervisors
981 "H" Street, Suite 200
Crescent City CA 95531
(707) 464-7204

October 26, 2004

Department of Interior
Bureau of Land Management
California Coastal National Monument
299 Foam Street
Monterey, California 93940

Attn: Herrick E. Hanks, Monument Manager

Re: California Coastal National Monument Draft Resource Management Plan/Draft EIS

Dear Mr. Hanks:

On behalf of the Board of Supervisors of Del Norte County, let me express my appreciation for the diversity of resources and complexity of issues facing you in developing the Draft Resource Management Plan and Draft EIS for the California Coastal National Monument area. The California coastline includes a range of physical environments from undeveloped publicly owned lands and shorelines to the heavily developed areas of southern California. The economic incomes range from our County's median household income of $29,673 to Marin's household income of $71,306 per year. We point these two issues out to emphasize the importance of two issues we believe you have overlooked or underestimated in your analysis.

The first issue deals with Transportation. Being as isolated as Del Norte County is, we are well aware of the significance of land transportation routes in and out of our area. Section 3.18 of your draft document addresses "…existing conditions of the roadways, transit services, and bicycle facilities in the CCNM planning area." Section 4.18.3.1 concludes that there will be "no effects on traffic and transportation from no action." This conclusion is incorrect. This County has already experienced complications from the designation of the CCNM on approaches to our only commercial airport at Pt. St. George (McNamara Field). This airport is our only air lifeline to the outside and is essential to our economic well being and the safety of our residents and visitors. The entire Transportation analysis fails to examine impacts upon or considerations for continued use or realignments of approach paths to airports. The Transportation section fails to mention or address any impacts or considerations for ocean going vessels. Our 22-A local economy is fragile at best and the use of our harbor for commercial and recreation activities is essential. Our rocky shoreline is replete with rocks and islands that are abundant in wildlife. What impacts or considerations will the draft and/of final CCNM plan permit or affect regarding the use of the CCNM area by commercial and private aircraft and vessels? The document is silent. 22-B

Similarly, the document does conclude as mentioned above that there will be no effects on land traffic and transportation. This conclusion is naïve at best. The document clearly states that the jurisdiction of the CCNM begins at the mean high tide. There are numerous locations throughout the north coast and the rest of California where a vital traffic arterial is located against the mean high tide line or immediately adjacent to it. Physical factors sometimes necessitate actions to maintain these arterials through shoreline maintenance, or construction that may involve activities below or at the mean high tide line. What impacts on the permitting process or funding process with the subject draft plan of the CCNM have on these projects? Where is any permissive language to allow the maintenance of these facilities or expansion should safety issues necessitate expansion? 22-C

The second issue that we wish to emphasize is the discussion in the draft regarding Indian Trust Resources (Section 4.8). While we believe that our three local federally recognized tribes are very capable of speaking on the behalf, we do not wish to remain silent of their support. It is our opinion that the Indian Trust Resources section does not adequately address the varied issues of our local tribal interests. This section tends to assume a potential conflict by stating "under all alternatives, seasonal use restrictions might conflict with uses and rights accorded to Indian trust resources. However, as discussed in Chapter 2, "Alternatives," valid existing rights would take precedence over limitations exacted by the seasonal restrictions. There would be no effect on Indian trust resources from wildlife resources management actions under any alternative." This wording implies that "valid existing rights" would have to be established or the seasonal restrictions would apply. Please be advised that our local tribes own land too and in some instances beyond the mean high tide line. By copy of this letter to our local tribes we are encouraging them to comment on the specifics of their individual or collective concerns. 22-D

In general the document is an analysis of and justification for research activities within the boundaries of the National Monument. While we have no objection to such research activities, we feel that the draft document inadequately addresses the impacts of the proposed action on the human environment either directly or indirectly. 22-E

Sincerely,

Jack Reese

Jack Reese, Chairman of the Board of Supervisors

cc: Senator Barbara Boxer
Senator Dianne Feinstein
Congressman Mike Thompson
Dale Miller, Tribal Chairman Elk Valley Rancheria
Kara Miller, Tribal Chairman Smith River Rancheria
Howard McConnell, Tribal Chairman Yurok Tribe

㉓

10-26-04

California Coastal National Monument
US Bureau of Land Management
299 Foam Street
Monterey, CA 93940

Please send me a copy of the draft management plan for the California Coastal National Monument so that I may comment on it.

When Clinton issued the executive order declaring the 20,000 rocks as a National Monument, he said that it was necessary to protect them from private citizens. He cited the instance where one rock was being destroyed by a mining company. **Where is this one rock?**

23-A

Since all these rocks and islands were removed from private entry in 1929 by President Hoover's executive order and the California Coastal Commission has piles of regulations prohibiting anything from being done to them, is there any additional protection that the BLM is providing other than additional bureaucracy? What is the relationship of the additional regulations to the previous regulations?

23-B

Charles Wilson
P.O. Box 127
Orick, CA 95555-0127

(24)

To: caqnm@ca.blm.gov
cc:
Subject: Draft RMP Feedback

city = Castro Valley
state = CA

comment = I write to express support for adoption of a RMP which permits and allows the greatest degree of public access to the CCNM. The CCNM is a public resource and the taxpaying public should be given full access to all areas of the coast. To the extent that public money is spent on the CCNM, it should be used to improve public access and facilities, such as boat ramps, restrooms and parking. Commercial vendors should be given access in popular locations to provide services such as dining. 24- Of the three alternatives discussed in the draft RMP, Alternative C, Recreation emphasis, appears to be best. 24-

withhold_id = withhold identification info
Submit = Submit

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(25)

Wednesday, November 03, 2004

US Bureau of Land Management
RE: California Coastal National Monument
299 Foam Street
Monterey, CA 93940

Sirs

I am opposed to BLM's "Preferred Alternative" draft management plan for the rocks and reefs off California's coast. 25-A

The plan is wholely based upon false observations of non-existant coastal degredation. 25-B

The plan is based on activist environmentalism rather than upon scientific method and documentation. 25-C

I am writing separate letters to the White House and to my senators and representatives asking that this proposal be crushed. 25-D

Sincerely yours

Judd W. Smith

Judd Smith
1589 Campus Drive
Berkeley, CA 94708
510 548 1769
js1589@berkeley.edu

(26)

"Smith"
<js1589@uclink.berkeley.edu>
11/03/2004 01:40 PM

To: <cacnm@ca.blm.gov>
cc:
Subject: Coastal Monument Draft RMP

I am opposed to BLM's draft management plan for the rocks and reefs off California's coast. **26-A**

The plan is based on false observation of non-existant coastal degradation. **26-B**

The plan is based on activist environmentalism rather than upon scientific method and documentation. **26-C**

Sincerely yours
Judd Smith
1589 Campus Drive
Berkeley, CA 94708
510 548 1769
js1589@berkeley.edu

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(27)

California Coastal National Monument RMP Response Form

For public input on the Draft California Coastal National Monument Resource Management Plan and Draft Environmental Impact Statement

Note: All items must be completed for form to be accepted

Today's Date: 11-14-04

Your name (please print): Mike Zanboni

Representing (put an X in one box only):

☐ Self only

☒ Business, organization or agency (specify): F/V Lucky 50

Address: 1341 Bel Nor Rd

City: Mckinleyville

State: CA Zip: 95519 Phone: 707-839-0930

Email (optional):

Important Privacy Notice: Under the Freedom of Information Act, all written comments, including names and street addresses, will be available for public review upon request and may be published by the BLM during the planning process. As an individual, however, you can ask us to withhold your name and address. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety. If you checked "self only" above, and would like us to withhold your name, put an X in this box: ☐

Comments on the California Coastal National Monument Draft RMP/Draft EIS:

I would prefer you take the No action alternative. These rocks are Naturally protected & have not been affected by man for the last 10,000 years. **27-A**

Since I'm sure this alternative which is the alternative preferred by the majority of those attending the meetings will not be the one adopted I ask that whatever one you choose doesn't impact the commercial or recreational fishing fleets. Part of the plan **27-B**

over

Mail form to:
California Coastal National Monument
299 Foam Street
Monterey, CA 93940

Or Fax to: (831) 647-4244

Continue your comments on the back of this page, or on additional pages

Mentions scientific study on these rocks. I have little doubt that your scientists can find a species of concern on every rock out there. 27-C

Creating "buffer zones" around these rocks will severely restrict my ability to make a living. 27-D

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(28)

California Coastal National Monument
RMP Response Form

For public input on the Draft California Coastal National Monument Resource Management Plan and Draft Environmental Impact Statement

Note: All items must be completed for form to be accepted Today's Date: 11-14-04

Your name (please print): Mike Zamboni

Representing (put an X in one box only):

☐ Self only

☒ Business, organization or agency (specify): F/V Lucky 50

Address: 1341 Bel Nor Rd

City: McKinleyville

State: CA Zip: 95519 Phone: 707-839-0930

Email (optional):

Important Privacy Notice: Under the Freedom of Information Act, all written comments, including names and street addresses, will be available for public review upon request and may be published by the BLM during the planning process. As an individual, however, you can ask us to withhold your name and address. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety. If you checked "self only" above, and would like us to withhold your name, put an X in this box: ☐

Comments on the California Coastal National Monument Draft RMP/Draft EIS:

If the goal of the RMP is only to protect the rocks. why is mention Made of restrictions on boat & kayak traffic? While the rocks themselves are of no value to commercial Fisherman the waters adjacent to them are. Any mention of restrictions around rocks should be stricken and any adopted restrictions will be devastating to My commercial Fishing bussiness. 28-A

Mail form to:
California Coastal National Monument
299 Foam Street
Monterey, CA 93940

Or Fax to: (831) 647-4244

Continue your comments on the back of this page, or on additional pages

(29)

California Coastal National Monument
RMP Response Form

For public input on the Draft California Coastal National Monument Resource Management Plan
and Draft Environmental Impact Statement

Note: All items must be completed for form to be accepted

Today's Date: 11-14-04

Your name (please print): Michael J Zamboni

Representing (put an X in one box only):

☐ Self only

☒ Business, organization or agency (specify): Lucky 50 Commercial fishing bussiness,

Address: 1341 Bel Nor Rd

City: McKinleyville CA 95519

State: CA Zip: 95519 Phone: (707)839-0830

Email (optional):

Important Privacy Notice: Under the Freedom of Information Act, all written comments, including names and street addresses, will be available for public review upon request and may be published by the BLM during the planning process. As an individual, however, you can ask us to withhold your name and address. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety. If you checked "self only" above, and would like us to withhold your name, put an X in this box: ☐

Comments on the California Coastal National Monument Draft RMP/Draft EIS:

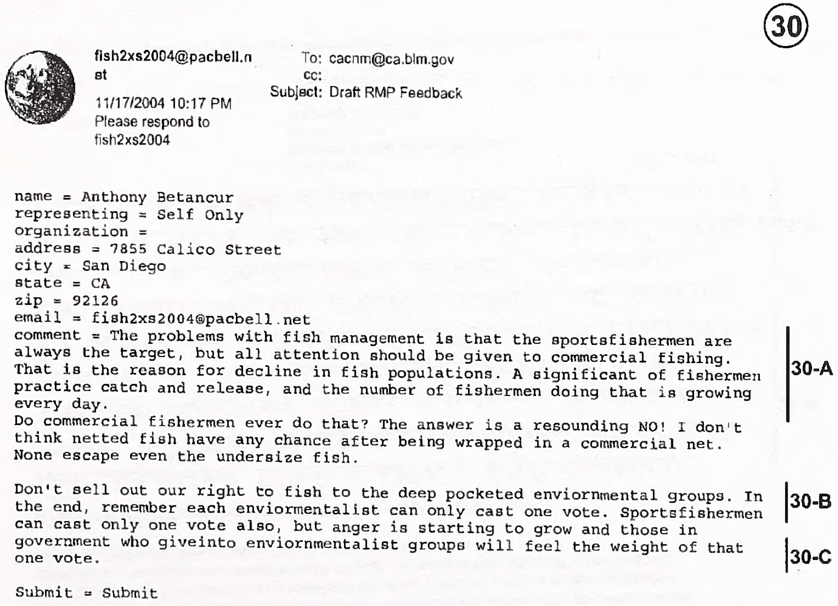
IN Section E.S.4.3 of the RMP mention is
made of ~~the~~ the MLPA & a coordinated effort with
the Ca. Department of Fish and Game. Since the
MLPA is unconstitutional Article 1 section
25 & Article X section 4 of the CA Constitution 29-A
prohibit the Act on state waters. I believe
this is a coordinated effort between
DFG & BLM to transfer ownership of offshore 29-B
rocky areas to federal jurisdiction to get around
over

Mail form to:
California Coastal National Monument
299 Foam Street
Monterey, CA 93940

Or Fax to: (831) 647-4244

Continue your comments on the back of this page, or on additional pages

the California Constitution and closing
Nearshore waters to Fishing and boat 29-B
traffic.



(30)

fish2xs2004@pacbell.net
11/17/2004 10:17 PM
Please respond to
fish2xs2004

To: cacnm@ca.blm.gov
cc:
Subject: Draft RMP Feedback

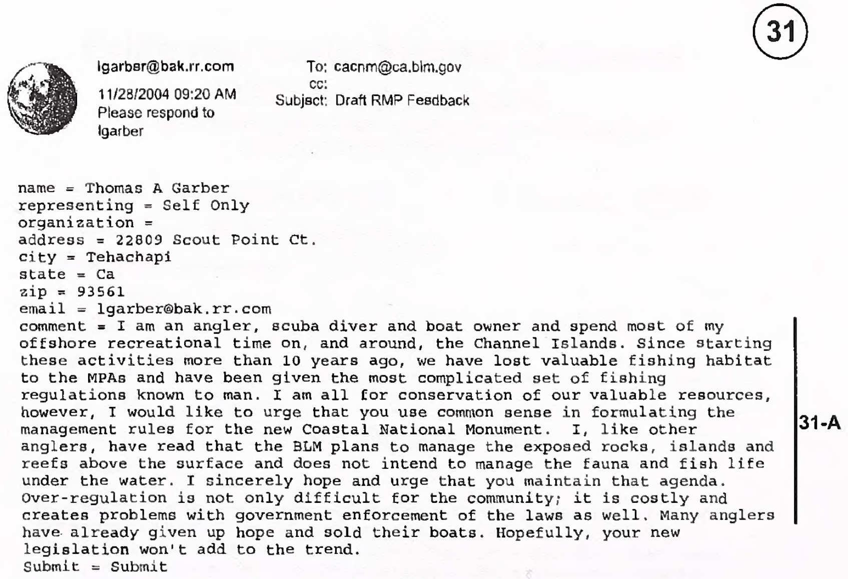
name = Anthony Betancur
representing = Self Only
organization =
address = 7855 Calico Street
city = San Diego
state = CA
zip = 92126
email = fish2xs2004@pacbell.net

comment = The problems with fish management is that the sportsfishermen are always the target, but all attention should be given to commercial fishing. That is the reason for decline in fish populations. A significant of fishermen practice catch and release, and the number of fishermen doing that is growing every day. 30-A

Do commercial fishermen ever do that? The answer is a resounding NO! I don't think netted fish have any chance after being wrapped in a commercial net. None escape even the undersize fish.

Don't sell out our right to fish to the deep pocketed enviornmental groups. In the end, remember each enviormentalist can only cast one vote. 30-B Sportsfishermen can cast only one vote also, but anger is starting to grow and those in government who giveinto enviornmentalist groups will feel the weight of that one vote. 30-C

Submit = Submit



(31)

lgarber@bak.rr.com
11/28/2004 09:20 AM
Please respond to
lgarber

To: cacnm@ca.blm.gov
cc:
Subject: Draft RMP Feedback

name = Thomas A Garber
representing = Self Only
organization =
address = 22809 Scout Point Ct.
city = Tehachapi
state = Ca
zip = 93561
email = lgarber@bak.rr.com

comment = I am an angler, scuba diver and boat owner and spend most of my offshore recreational time on, and around, the Channel Islands. Since starting these activities more than 10 years ago, we have lost valuable fishing habitat to the MPAs and have been given the most complicated set of fishing regulations known to man. I am all for conservation of our valuable resources, however, I would like to urge that you use common sense in formulating the management rules for the new Coastal National Monument. I, like other anglers, have read that the BLM plans to manage the exposed rocks, islands and reefs above the surface and does not intend to manage the fauna and fish life under the water. I sincerely hope and urge that you maintain that agenda. Over-regulation is not only difficult for the community; it is costly and creates problems with government enforcement of the laws as well. Many anglers have already given up hope and sold their boats. Hopefully, your new legislation won't add to the trend. 31-A

Submit = Submit

(32)

"Carl Lind"
<clind1@san.rr.com>
11/30/2004 01:44 PM

To: <cacnm@ca.blm.gov>
cc:
Subject: Comments; California Coastal National Monument

Comments on California Coastal National Monument *Draft RMP/Draft EIS*

I attended the October 27, 2004 (La Jolla) meeting pertaining to the California Coastal National Monument (CCNM). Here are my comments:

1) Re ES.4.12 Cadastral Support: A general survey of existing rocks and islands within the CCNM is not justified, either by need or cost. Many of the rocks are of moderate size or extremely small, so such a survey would be very expensive and time consuming. **"Es.4.12 Cadastral Support" should be eliminated.** 32-A

2) The jurisdiction of the BLM should not be exceeded. **CCNM status should not be used to diminish existing fishing rights or fishing access.** 32-B

3) The rocks and islands within the CCNM are not significantly "manageable". **The terms "protection" and "law enforcement" should be emphasized.** 32-C

4) The Draft RMP attempts to fix a problem that doesn't exist. Federally owned lands that lie offshore the California coast have been successfully "managed" for years. In the 1930's this was done by Executive Order. In 1983, by a Public Land Order establishing the federal *California Rocks and Islands Wildlife Sanctuary*; but managed by the State of California (via a Memorandum of Understanding) as the *Offshore Rocks and Pinnacles Ecological Reserve* (ORPER). I understand that ORPER still exists under a new MOU. **All lands in the CCNM should continue their previous management under ORPER, the California Department of Fish & Game, and Title 14 of the California Code.** 32-D

5) Because of the lack of significant need for change, and the fiduciary responsibility of government entities to spend taxpayer dollars wisely, **the "No Action Alternative" should be chosen.** 32-E

Sincerely,

Carl B. Lind
247 Gravilla Street
La Jolla, CA 92037

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(33)

e| info@oceanlaguna.org
w| oceanlaguna.org
a| Ocean Laguna Foundation
PO Box 9207
Laguna Beach, CA 92652

OCEAN LAGUNA
FOUNDATION

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Mr. Herrick Hanks
Monument Manager
Bureau of Land Management
California Coastal National Monument
299 Foam Street
Monterey, California 93940

December 1, 2004

Subject: Comments on Draft RMP/Draft EIS

Dear Mr. Hanks:

The Ocean Laguna Foundation appreciates the opportunity to comment on the Draft RMP/EIS for the California Coastal National Monument (CCNM). We believe the draft EIS provides a solid basis for programmatic environmental documentation that undoubtedly accompany future management decisions and actions as they are developed and implemented. Our comments below are of the kind that we believe can be easily integrated into the final RMP/EIS, and are offered in the cooperative spirit of our anticipated role as a partner in local implementation (and development) of the RMP.

Wildlife Resources (p. 2-23)
The first sentence of this section identifies the intent of management activities as accomplishment of specific goals "with a *minimum of negative effect* on marine birds and mammals." (Italics added.) We note that while the focus of NEPA is avoidance of negative effects, the charge of the RMP is, or should be, much higher in its aim, encompassing "protection and management" of resources. Thus, while the NEPA side of the document emphasizes a passive relationship toward resources (motivated by avoidance or minimization of impacts), the RMP side must take a more proactive role relative to resources – one that ensures the long-term benefits of "protection and management". It is important not to confuse the two roles of this tandem document and their fundamentally different goals. A set of implementing actions that merely meets the thresholds for impact avoidance in accordance with NEPA would fail to achieve the more ambitious goals of the Monument designation. 33-A

Moreover, we believe that in its strategies for protecting and managing resources, the RMP and its programs should establish clear definitions of success based on specific criteria. In keeping with the broad language of the Executive Proclamation, management criteria should be based on the goal of preserving Monument resources *in perpetuity*. This objective may not be achievable through RMP programs whose criteria for success are based merely on maintaining the status quo of resources (i.e., maintaining the current baseline conditions), as today's populations of some plant and animal species may not be sufficiently stable to ensure their long-term viability. 33-B
The Monument's resources inventory should include an assessment of the viability 33-C

of key vegetation and wildlife species and their populations that is not limited to species currently listed by the State or Federal agencies as rare, threatened or endangered. The results of that assessment should be applied toward development of management strategies whose criteria for success is resource preservation in perpetuity.

33-C

33-B

The third paragraph outlines a major management strategy of the draft RMP, based on the assumption that "management of people would probably. . . have the greatest potential for immediate positive results." While it is intuitively evident that human activities are a major potential source of adverse effects on wildlife resources, it has not been established with certainty that direct human disturbance provides the greatest threat to resources. It may very well be that indirect effects of human activities pose a much greater threat (e.g., water quality degradation resulting from watershed activities). To ensure optimum effectiveness and cost benefit, management strategies should be based on a full understanding of the relative threats posed to resources by the full range of potential impact sources, rather than simply defaulting to those management activities that "would probably be the easiest to accomplish" (p. 2-23). Although it is clear that the Monument's managers will not have direct authority to regulate activities outside the Monument's jurisdiction, strategies that employ indirect management activities, such as collaborating with other agencies that have jurisdiction over watershed activities (for example) may be a more effective means of addressing the greatest threats to resources within the monument's jurisdiction.

33-D

Plan Decisions (p. 2-24)
The first paragraph identifies a process whereby "sensitive wildlife resource areas" would be identified "As new information came to light". This implies that development of the knowledga base for designation of these areas will be largely opportunistic, rather than the result of an active program to develop a database suitable for management purposes through directed research. We believe it is probable that appropriate management of wildlife (and other resources of the monument) will require management-oriented information that is specific to the resources and management issues uniquely germane to the monument and which can be derived only through original, management-oriented research. To meet this need, the RMP should include and/or prescribe as one of its earliest actions an assessment of information needs to be used as the basis for development of a preliminary research agenda. The research agenda should be broad enough to address the principal outstanding questions facing management in its challenge to protect biotic resources in perpetuity. The RMP should also include strategies for funding the research agenda.

33-E

These few comments, while focusing on potential strategies for managing biotic resources, reflect the relatively unformed nature of the draft RMP, and apply in general to management of all resources within the Monument.

33-F

We note that the Ocean Laguna Foundation was not included in the Draft RMP version of Table 2-1, which pre-dates our orgaoization's anticipated partnership role relative to several activities: education and interpretation, inventory and mapping, research, enforcement, and publicity.

33-G

On behalf of the Ocean Laguna Foundation, thank you for your consideration of our comments. We look forward to further collaborative efforts to develop more fully defined management strategies aimed at protecting the local resources within the jurisdiction of the California Coastal National Monument.

Sincerely yours,

Ed Almanza

2

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(34)

Glenn Stockwell
<oldncold@saber.net>
12/06/2004 02:59 PM

To: cacnm@ca.blm.gov
cc:
Subject: CCNM Draft

Herrick E. Hanks
Monument Manager
CCNM

Dear Mr. Hanks:

I recently completed a review of the Draft Resource Management Plan/Draft Environmental Impact Statement for the CCNM and I would like the following comments included in the public input received regarding the draft statement.

I became aware of the CCNM because as a fisherman (now sports only but in the past I have operated a charter fishing business and fished commercially) and as an avid surfer (I am a past chairman of the Surfrider Foundation□s national board of directors), I am interested in any potential for new or changed regulation of the near shore ocean habitat. In addition, I am an Emeritus Professor of Political Science and continue to pay close attention to national, state and local politics.

In the waning days of the Clinton administration, it was decided that the numerous large rocks and small islands immediately adjacent to the California shoreline should be protected from potential destruction or inappropriate useage through commercial exploitation. As a result a Presidential Proclamation established the CCNM. The primary concern of those who proposed and shaped the proclamation was to ensure that there were no □gray arcas□ within the mining laws that might allow somsone to attempt to obtain mining or other exploitive rights of any part of the physical structure off the California coastline. Thus, when the proclamation gave the Secretary of the Interior the responsibility of managing the monument through the BLM, I believe that the intent was clearly to enforce the ban on commercial exploitation and not to interfere with low impact public utilization of the resource and its immediate environs. As a result, I am very concerned that a number of the statements in the draft plan would seem to imply that the public will only be allowed to enjoy this resource visually. On page ES-13 the report says that Alternative A □Supports low-impact recreation (□appreciation from afar□)□. In addition, on the same page it notes that Alternative A is □the preferred alternative□. This would seem to open the door to restriction of non-destructive recreational activities like fishing, kayaking, surfing and diving. Statements like that on ES 4.6 that support activities that □do not disturb wildlife□ which includes □wildlife viewing, photography, and painting□ are potential problems in that they raise the issue of what level of □disturbance□ should be tolerated to allow non-destructive and non-displacing recreational activities? Should surfers or fishermen of tide pooling children be banned so that visitors will □know that they are seeing a place whers nature is protected in its most pristins form□ (p 2-28 to 2-29)?

34-A

34-B

With the proclamation in place, no one will be able to lay claim to any of the physical structure which makes up the CCNM, and it is now the BLM□s job to make sure that is the cass. Going beyond this straightforward responsibility would merely promote duplication of effort and unnecessary interference with the State of California, the long term and correct steward of the fish and wildlife of these areas.

34-C

Regards,

Glenn Stockwell

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Raymond C. Wilson
Dec. 9, 2004

California Coastal National Monument,
299 Foam Street,
Monterey, CA. 93940

I, Raymond C. Wilson, is an individual respondent ○ and wish my name and address or only address withheld from public review. I do request the Final EIS.

~~I~~ I have lived along the northwest coast and especially the California coast since 1968.

Just a cursory Review of the USDA Forest Service Research paper PSW-82/1972, on the Distribution of Forest trees in California — By James R. Griffin + William B Critchfield Will enthrall one concerning the Diversity of Tree + Plant communities ~~on~~ our Western shore and upland; i.e, foothill woodland, northern oak woodlan, Southern oak wood land Pinyon - Juniper Woodland, Mixed Conifer Forest, Red Fir Forest, Douglas Fir Forest, Redwood Forest, north coast coniferous Forest, and more! These Eco-systems are Diverse with their flora and fauna and to visit the shore line anywhere from Del norte County to San Diego. County can't help but be a revelation. 35-A

I congradulate you on your Taking on the Job of protecting and making 35-B availible to US citizens and Visitors the new California Coastal National Monument. Again, I patiently await the Final EIS and thank you so much! 35-B

Sincerely yours,

Raymond C. Wilson

Dec 10-04

(36)

Dear Mr. Hanks, CCNM Manager,

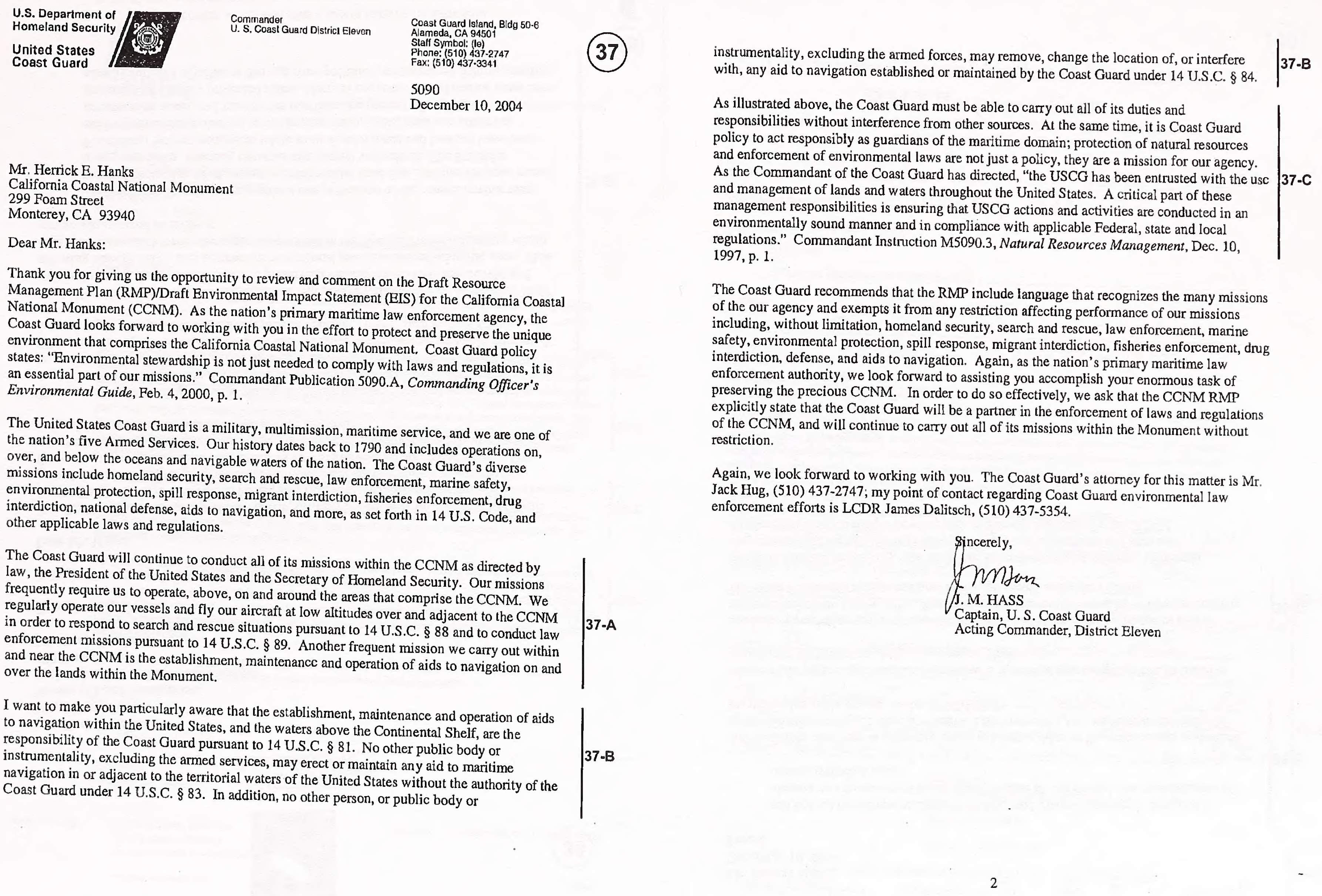
I appreciate the idea of protecting the 20,000 rocks of the California Coastline.

But I do not want to see Trinidad be the "Gateway" to the monument. I'm not interested in exploiting Trinidad's beauty. 36-A

Thankyou for your time.

Cristy Sabo
PO Box 115
Trinidad Ca
95570

707-677-0949



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U.S. Department of Homeland Security
United States Coast Guard

Commander
U. S. Coast Guard District Eleven

Coast Guard Island, Bldg 50-6
Alameda, CA 94501
Staff Symbol: (le)
Phone: (510) 437-2747
Fax: (510) 437-3341

5090
December 10, 2004

Mr. Herrick E. Hanks
California Coastal National Monument
299 Foam Street
Monterey, CA 93940

Dear Mr. Hanks:

Thank you for giving us the opportunity to review and comment on the Draft Resource Management Plan (RMP)/Draft Environmental Impact Statement (EIS) for the California Coastal National Monument (CCNM). As the nation's primary maritime law enforcement agency, the Coast Guard looks forward to working with you in the effort to protect and preserve the unique environment that comprises the California Coastal National Monument. Coast Guard policy states: "Environmental stewardship is not just needed to comply with laws and regulations, it is an essential part of our missions." Commandant Publication 5090.A, *Commanding Officer's Environmental Guide*, Feb. 4, 2000, p. 1.

The United States Coast Guard is a military, multimission, maritime service, and we are one of the nation's five Armed Services. Our history dates back to 1790 and includes operations on, over, and below the oceans and navigable waters of the nation. The Coast Guard's diverse missions include homeland security, search and rescue, law enforcement, marine safety, environmental protection, spill response, migrant interdiction, fisheries enforcement, drug interdiction, national defense, aids to navigation, and more, as set forth in 14 U.S. Code, and other applicable laws and regulations.

The Coast Guard will continue to conduct all of its missions within the CCNM as directed by law, the President of the United States and the Secretary of Homeland Security. Our missions frequently require us to operate, above, on and around the areas that comprise the CCNM. We regularly operate our vessels and fly our aircraft at low altitudes over and adjacent to the CCNM in order to respond to search and rescue situations pursuant to 14 U.S.C. § 88 and to conduct law enforcement missions pursuant to 14 U.S.C. § 89. Another frequent mission we carry out within and near the CCNM is the establishment, maintenance and operation of aids to navigation on and over the lands within the Monument. **37-A**

I want to make you particularly aware that the establishment, maintenance and operation of aids to navigation within the United States, and the waters above the Continental Shelf, are the responsibility of the Coast Guard pursuant to 14 U.S.C. § 81. No other public body or instrumentality, excluding the armed services, may erect or maintain any aid to maritime navigation in or adjacent to the territorial waters of the United States without the authority of the Coast Guard under 14 U.S.C. § 83. In addition, no other person, or public body or instrumentality, excluding the armed forces, may remove, change the location of, or interfere with, any aid to navigation established or maintained by the Coast Guard under 14 U.S.C. § 84. **37-B**

As illustrated above, the Coast Guard must be able to carry out all of its duties and responsibilities without interference from other sources. At the same time, it is Coast Guard policy to act responsibly as guardians of the maritime domain; protection of natural resources and enforcement of environmental laws are not just a policy, they are a mission for our agency. As the Commandant of the Coast Guard has directed, "the USCG has been entrusted with the usc and management of lands and waters throughout the United States. A critical part of these management responsibilities is ensuring that USCG actions and activities are conducted in an environmentally sound manner and in compliance with applicable Federal, state and local regulations." Commandant Instruction M5090.3, *Natural Resources Management*, Dec. 10, 1997, p. 1. **37-C**

The Coast Guard recommends that the RMP include language that recognizes the many missions of the our agency and exempts it from any restriction affecting performance of our missions including, without limitation, homeland security, search and rescue, law enforcement, marine safety, environmental protection, spill response, migrant interdiction, fisheries enforcement, drug interdiction, defense, and aids to navigation. Again, as the nation's primary maritime law enforcement authority, we look forward to assisting you accomplish your enormous task of preserving the precious CCNM. In order to do so effectively, we ask that the CCNM RMP explicitly state that the Coast Guard will be a partner in the enforcement of laws and regulations of the CCNM, and will continue to carry out all of its missions within the Monument without restriction.

Again, we look forward to working with you. The Coast Guard's attorney for this matter is Mr. Jack Hug, (510) 437-2747; my point of contact regarding Coast Guard environmental law enforcement efforts is LCDR James Dalitsch, (510) 437-5354.

Sincerely,

J. M. HASS
Captain, U. S. Coast Guard
Acting Commander, District Eleven

2

Surfrider Foundation

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Mr. Herrick Hanks
Monument Manager
Bureau of Land Management
California Coastal National Monument
299 Foam Street
Monterey, California 93940

December 10, 2004

Subject: Comments on Draft RMP/Draft EIS

Dear Mr. Hanks:

The Surfrider Foundation appreciates the opportunity to comment on the Draft RMP/EIS for the California Coastal National Monument (CCNM). We believe the draft EIS provides a solid basis for programmatic environmental documentation to accompany future management decisions and actions as they are developed and implemented. Our comments below are offered in the cooperative spirit of our anticipated role as a partner in local implementation (and development) of the RMP.

First, we appreciate being included among the list of organizations that can potentially contribute to implementation of the RMP in the areas of education and interpretation, inventory and mapping, research, enforcement and publicity. Surfrider Foundation has 20 chapters along the coast of California and our chapter activists are intensely interested in working to preserve our coastal and marine "Special Places" such as the CCNM. 38-A

We believe that the "Balanced Management" alternative (Alternative A) in the draft RMP strikes an appropriate balance between preserving natural resources in the CCNM and allowing non-intrusive, non-destructive recreational and educational/scientific uses. This approach is consistent with the approach outlined in our Special Places campaign, which can be summarized as follows: 38-B

> The Surfrider Foundation recognizes that protection of the coastal environment requires protection of an interconnected coastal zone that includes the open ocean, near shore water, beaches, estuaries and coastal watersheds. The Surfrider Foundation further recognizes while some coastal lands and beaches have been set for permanent protection as wilderness areas, parks, reserves, preserves, conservation areas, and sanctuaries less than one percent of our marine environment has any protected status. Many of our most valued marine areas have already suffered significant damage from pollution, mismanaged fishing practices and coastal development impacts. The Special Places campaign is designed to identify and protect special ocean and coastal places through the establishment of marine protected areas.

·NATIONAL OFFICE • P.O. BOX 6010 • SAN CLEMENTE, CA 92674-6010
(949) 492-8170 • FAX (949) 492-8142 • www.surfrider.org • E-MAIL info@surfrider.org

a member of EarthShare

Mr. Herrick Hanks
December 10, 2004
Page 2

Although this campaign is primarily aimed at creating Marine Protected Areas, as defined by documents such as California's Marine Life Protection Act, we believe that many of the principles apply equally to the CCNM RMP. 38-B

More details regarding Surfrider Foundation's Special places campaign can be found at http://www.surfrider.org/campaigns/special_places.asp

Surfrider Foundation also favors acquisition of 23 offshore rocks or groups of rocks (Appendix J of the document) so that these rocks (currently owned by US Forest Service, US Coast Guard and private entities) can be protected under the CCNM. 38-C

We look forward to working with BLM and its core managing partners, California Department of Fish and Game (DFG) and California Department of Parks and Recreation (DPR) to further develop and implement the RMP for the CCNM.

For the Oceans, Waves and Beaches,

Rick Wilson

Rick Wilson
Coastal Management Coordinator
Surfrider Foundation

(39)

NRDC
The Earth's Best Defense

Natural Resources Defense Council

December 10, 2003

Rick Hanks
Manager, California Coastal National Monument
U.S. Bureau of Land Management
299 Foam St.
Monterey, CA 93940

Re: Comments on the draft EIS for the California Coastal National Monument

Dear Mr. Hanks:

On behalf of the over 1 million members and activists of NRDC (Natural Resources Defense Council), we appreciate your efforts to increase protection for the wildlife and habitats of the California Coastal National Monument (CCNM).

We support the preferred alternative, Alternative A. In particular, we agree with the decision to focus research and protection on both native plants and wildlife. The survey work to identify key seabird and marine mammals sites, described under "Wildlife Resources", should be a priority because of the need for such information as part of the Marine Life Protection Act initiative. 39-A The "Virtual Monument" offers the opportunity for increased public access and education, which can in turn improve compliance. This web portal should take advantage of related online resources and projects now getting underway, such as the California Coastal Records Project, the state's GIS mapping program, the California Coastal Observing System. 39-B

As the draft plan recognizes, the CCNM is nestled within a large network of other federal and state authorities. The stated dedication to cooperation and collaboration with other agencies and organizations will be critical to achieving real protection for CCNM resources. We are pleased that the draft plan sets high goals for the CCNM, reflecting those laid out in the presidential proclamation, but those goals cannot be achieved by BLM alone. 39-C

To that end, BLM should conduct a detailed assessment of available staffing and budget resources with all core managing partners to identify gaps that BLM itself can fill. Table 2-1 gives a look at overlap among agencies by general subject, but this is not at the level of specificity needed to undertake actual projects. There are certain activities on the rocks themselves where BLM may be the best agency for the job; we strongly encourage you to sit down with your partners as soon as possible to produce a more detailed action plan. 39-D

Thank you for providing us with an opportunity to review and comment on the draft EIS and management plan. Please feel free to contact us if you have further questions.

Sincerely,

Kate Wing
Ocean Policy Analyst

David Newman
Legal Fellow

www.nrdc.org

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TEL 415 875-6100 FAX 415 875-6161

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California Coastal National Monument RMP Response Form

For public input on the Draft California Coastal National Monument Resource Management Plan and Draft Environmental Impact Statement

Note: All items must be completed for form to be accepted

Today's Date: Dec 12 - 04

Your name (please print): Cristy Sabo

Representing (put an X in one box only):

☑ Self only

☐ Business, organization or agency (specify):

Address: PO Box 115

City: Trinidad

State: Ca Zip: 95570 Phone: 707-677 - 0949

Email (optional):

Important Privacy Notice: Under the Freedom of Information Act, all written comments, including names and street addresses, will be available for public review upon request and may be published by the BLM during the planning process. As an individual, however, you can ask us to withhold your name and address. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety. If you checked "self only" above, and would like us to withhold your name, put an X in this box: ☐

Comments on the California Coastal National Monument Draft RMP/Draft EIS:

I do not want to see Trinidad become the "Gateway" to the monument. Trinidad is already Too crowded in the summer. Scenic drive is Too small and dangerous To support more traffic. 40-A I do not want access to the ocean restricted by more rules + regulations. 40-B

Mail form to:
California Coastal National Monument
299 Foam Street
Monterey, CA 93940

Or Fax to: (831) 647-4244

Continue your comments on the back of this page, or on additional pages

Monterey seems to be a good candidate for the Gateway. It is → 40-C already set up to accept lots of tourists.

thank you for your time.

Sincerely, Cristy Sabo

40-C

United States Department of the Interior

FISH AND WILDLIFE SERVICE
San Francisco Bay National Wildlife Refuge Complex
P.O. Box 524
Newark, California 94560-0524
(510) 792-0222

41

13 December 2004

Rick Hanks
California Coastal National Monument
299 Foam Street
Monterey, CA 93940

Dear Mr. Hanks:

The San Francisco Bay National Wildlife Refuge Complex has reviewed the draft Resource Management Plan (RMP) for the California Coastal Monument (CCNM). We are providing these technical comments based on our knowledge of the islands/rocks in the CCNM. Additional comments may be provided by other offices of the U.S. Fish and Wildlife Service relating to the Endangered Species Act, the Fish and Wildlife Coordination Act or other authorities.

We found the document to be thorough in addressing the issues and threats pertaining to wildlife and vegetation resources on the monument, particularly in relation to seabirds and marine mammals. We agree that human disturbance is one of the most significant threats to seabirds and marine mammals in the CCNM. 41-A

We agree with the selection of Option A (Balanced Management) as the preferred option for management of the CCNM. This offers a balanced approach of protecting CCNM resources from human disturbance while permitting non-disruptive human enjoyment and education, as well as needed monitoring and research. While Option B (Resource Protection Emphasis) will provide the best protection of resources from human disturbance, collection of basic information on CCNM resources will be difficult and information may not be available for important management decisions. Management of invasive species will also be difficult, possibly to the detriment of native CCNM resources. Option C (Recreation Opportunity Emphasis) may result in significant harm to the seabirds and marine mammals dependent on the CCNM for breeding and resting because it allows additional recreation in the CCNM. 41-B

As part of the outreach aspect of the CCNM, posting "Do Not Enter" signs at certain, more accessible rocks of the CCNM would improve protection of resources. In particular, rocks accessible at low tides or within popular marine recreation areas should be targeted. For example, our personnel have observed the public accessing Little River Rock (off Trinidad, Humboldt County) and San Pedro Rock (near Pacifica, San Mateo County) from the mainland during low tides. As mentioned in the RMP, Anchor Rock (off Little River, Mendocino County) appears to be a popular landing spot for divers. All of these rocks are known to harbor breeding populations of seabirds, and San Pedro Rock is a harbor seal pupping and haul-out location. 41-C

Below are detailed, specific comments on the RMP:

1) Figure 1-4b (North Coast map) - Does not show Castle Rock National Wildlife Refuge, located just off Pt. St. George. 41-D

2) Figure 1-4c (North Central Coast map) - Does not indicate that Marin Islands (in north San Francisco Bay) are a National Wildlife Refuge (NWR). 41-E

3) Figure 1-4d (Central Coast map)
- Identifies "Salinas River NWA", but should be "Salinas River NWR."
- Does not show Guadalupe Dunes NWR 41-F

4) Figure 1-4e (San Diego Coast map) - Does not show South San Diego Bay NWR. 41-G

5) Figure 2-2b. Unit 36. Farallon Islands should be codes as "other federal". 41-H

6) Page 2-24, 2nd par., 2nd sentence. Suggest strengthening the criteria for exceptions to access by changing this sentence to read: "Exceptions for access would be made only where shown that the access would not disturb wildlife or other sensitive resources, or where needed to protect human safety." 41-I

7) Page 2-24, 2nd par., line 8 : Replace word "airplanes" with "aircraft" to be inclusive of airplanes, helicopters, ultralights, hang gliders, etc. Also, add "surfing" to list of activities that should be closely managed. 41-J

8) Page 2-24, 2nd par.: Seasonal restrictions should not be limited to nesting/pupping seasons at all locations. Certain areas may be sensitive to human disturbance during non-breeding seasons because they are used as pinniped haul-outs or seabird roosting areas. For example, seabird species such as ashy storm-petrels, Brandt's cormorants, western gulls, common murres, and Cassin's auklets, frequently visit nesting sites during the non-breeding season. Recommend that timing for restrictions be evaluated on a site-by-site basis. 41-K

9) Page 2-37. The Research and Monitoring Permit Criteria are well thought-out. Suggest adding one under the "Suitability of proposed research would increase category" as follows: "Research would not disturb seabirds or marine mammals." 41-L

10) Table 2-6 : Pupping season for elephant seal goes beyond 15 January. Restrictions to protect elephant seals from human disturbance should include the time period when weaned pups are on the beach without parental care (extends into March). Check the appropriate dates with literature or elephant seal experts. 41-M

11) Agree with research and monitoring efforts of Option A. Some efforts, especially inventory and monitoring, could be coordinated with USFWS. 41-N

12) Section 2.4.6 Monitoring and Adaptive Management Monitoring Priorities (P. 2-55): 41-O

- Replace "Recreation activity in the vicinity of sensitive seabird and pinniped use areas" with "Recreation, commercial, or other human activity in the vicinity of sensitive seabird and pinniped use areas"
- Replace "Effects of recreation activity..." to "Effects of human activity..." to reflect other user groups (e.g., commercial) that can cause disturbance. 41-O

13) Section 3.2.2.1; Terrestrial Vegetation (p. 3.2-1)
Here are two references on vegetation of the coastal rocks you may not be aware of:
Osborne, T. O. 1972. Ecology and avian use of the coastal rocks of northern California. Master's thesis, Humboldt State Univ., Arcata, CA.
Vasey, M. C. 1985. The specific status of *Lasthenia maritima* (Asteraceae), and endemic of seabird-breeding habitats. Madroño 32(3): 131-142.

While conducting studies of northern California's nesting seabirds, Osborne (1972) recorded the dominant species of plants occurring on many of the rocks between Cape Mendocino and the Oregon border. Vasey (1985) identified *Lasthenia maritima* (commonly known as Farallon weed) as a distinct species nearly endemic to the coastal rocks from Vancouver Island to San Luis Obispo County, California. 41-P

14) Section 3.3.2.2 Habitat conditions and threats to wildlife (p. 3.3-5)
- Note that some rocks are accessible from the mainland at low tides (e.g., Little River Rock, Humboldt County; San Pedro Rock, San Mateo County).
- Trampling of habitat when humans access rocks can also pose a threat to vegetation and burrow nesting seabirds. 41-Q

15) Fishing (p. 3.3-5)
- States that "the most susceptible areas for Brandt's cormorants and common murres are in the northern half of the state." This is true for murres, but Brandt's Cormorants breed commonly along nearly the entire California coast (except that only two colonies along the mainland south of Pt. Conception). 41-R

16) The list of islands not included in monument (Table 3.9-1) is extremely valuable. However, for some islands, the exact location is still unclear. The document would benefit if these non-CCNM islands were shown in the map of the CCNM area, or perhaps latitudes/longitudes could be provided in Table 3.9-1. 41-S

17) Appendix E. page 5
Under the Farallon Islands Sub-unit, the correct name for the Refuge is "Farallon NWR". Drop Islands and correct spelling. 41-T

18) Table G-1. Preliminary list of know bird sites in the CCNM.
- Add Ashy Storm-Petrel to nesting species at Castle Rocks, and Hurricane Pt. Rocks, and Cassin's Auklet for Castle Rocks (all in Sub-unit 20, Big Sur). We have provided a reprint of McChesney et al. (2000) that documented these nesting records.
- Colony name Bench Mark-227X (Sub-unit 20, Big Sur) is not listed. Currently, has nesting 41-U

ashy storm-petrel, brandt's cormorant, western gull, common murre, and pigeon guillemot.

19) Here are a few additions to Appendix G-2. Preliminary list of know marine mammal sites. Knowledge of these sites is based on incidental observations of USFWS personnel (G. McChesney, pers. obs.):

- 4. Trinidad subunit: Sea Lion Rock (Calif. and Stellar sea lions);
- 17. San Mateo/Santa Cruz: San Pedro Rock (*Phoca* pupping/haulout; *Zalophus*; occasional *Eumatopius*); Devil's Slide Rock (*Zalophus*. Use varies; most years little to none);
- 19. Monterey Peninsula: Rocks off Hopkins Marine Station (*Phoca*); Seal Rock (*Phoca*, poss. *Zalophus*);
- 20. Big Sur: Lobos Rocks (*Zalophus*);
- 22. San Luis Obispo South: Pup Rock; Lion Rock (both large *Zalophus* haul-outs);
- 24. Vandenberg/Point Conception: Lion Rock (off Pt. Sal; large *Zalophus* haul-out).

If you have any questions on these comments or other issues, please contact Gerry McChesney (510-792-0717, ext. 222) or Joelle Buffa (510-792-0222, ext. 32). We look forward to coordinating with the CCNM on the management of California's coastal resources.

41-V

Sincerely,

Margaret J. Kolar

Margaret Kolar, Project Leader
San Francisco Bay National Wildlife Refuge Complex

NESTING OF ASHY STORM-PETRELS AND CASSIN'S AUKLETS IN MONTEREY COUNTY, CALIFORNIA

GERARD J. McCHESNEY and HARRY R. CARTER, U.S. Geological Survey, Biological Resources Division, Western Ecological Research Center, 6924 Tremont Road, Dixon, California 95620 and Department of Wildlife, Humboldt State University, Arcata, California 95521

MICHAEL W. PARKER, U.S. Fish and Wildlife Service, San Francisco Bay National Wildlife Refuge Complex, P. O. Box 524, Newark, California 94560

ABSTRACT: We report the first known nesting of the Ashy Storm-Petrel and Cassin's Auklet in Monterey County, California, on offshore rocks around Castle Rock and Hurricane Point. Four nests and 13 mist-netted storm-petrels, together with the extent of suitable habitat, suggest a population of 10 to 30 pairs. A single abandoned Cassin's Auklet egg, pink guano, and small numbers of other potential nest sites imply no more than five pairs of that species. Similar small colonies of these species may be scattered on similar offshore rocks along the central California coast, linking the major colonies on the Farallon and Channel islands.

The Ashy Storm-Petrel (*Oceanodroma homochroa*) is nearly endemic as a breeding bird to coastal central and southern California. Most of the world population breeds within two main nesting centers: the South Farallon Islands (San Francisco County) off central California and the California Channel Islands (Santa Barbara, Ventura, and Los Angeles counties) off southern California (Sowls et al. 1980; Carter et al. 1992, unpubl. data; Ainley 1995). The breeding range of the Cassin's Auklet (*Ptychoramphus aleuticus*) extends along the Pacific coast of North America from the Aleutian Islands, Alaska, to northern Baja California Sur, Mexico (AOU 1998). Like the storm-petrel, in California most Cassin's Auklets breed at the South Farallon and Channel islands (Sowls et al. 1980, Carter et al. 1992). Until recently, neither the storm-petrel nor the auklet had been known to nest between these locations, except for recent nesting by small numbers of auklets at Año Nuevo Island, San Mateo County (Thayer et al. 1999). Populations of both species in California are thought to have declined in the last two decades, raising concern particularly for the Ashy Storm-Petrel (Carter et al. 1992, Sydeman et al. 1998).

In 1996 and 1997, we discovered nesting by Ashy Storm-Petrels and Cassin's Auklets on a group of offshore rocks collectively known as the Castle/Hurricane colony complex in coastal Monterey County, California. Our reports of nesting by these species are the first for the county.

STUDY SITE AND METHODS

The Castle/Hurricane colony complex (hereafter, Castle/Hurricane) is located just north of Point Sur, Monterey County, California (Figure 1). This complex of mostly barren offshore rocks and mainland cliffs is composed of three seabird colonies, as defined by Sowls et al. (1980): Bench Mark-227x (BM), Castle Rocks and Mainland (CRM), and Hurricane Point Rocks (HPR).

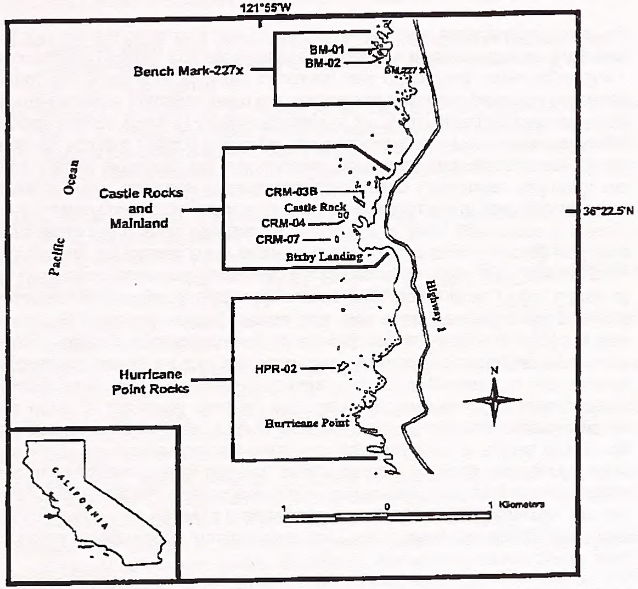

Figure 1. Castle/Hurricane colony complex, Monterey County, California. Abbreviations indicate subcolonies discussed in the text.

The offshore rocks of the complex have been part of the California Islands Wildlife Sanctuary (designated in 1983) and State Ecological Reserve (designated in 1988), managed by the California Department of Fish and Game for the U.S. Bureau of Land Management. In January 2000, the California Islands Wildlife Sanctuary was incorporated into the newly established California Coastal National Monument (P. R. Kelly, Calif. Dept. Fish and Game, pers. comm.). Between 1979 and 1992, seven species of seabirds (two cormorants, one oystercatcher, one gull, and three alcids) were documented nesting or possibly nesting at these colonies, with most birds at CRM and HPR (Sowls et al. 1980, Carter et al. 1992, Roberson and Tenney 1993). In this paper, we refer to the different rocks by their recognized subcolony (or rock) numbers (after Carter et al. 1992, McChesney et al. 1999).

We surveyed for crevice-nesting seabirds at Castle/Hurricane in conjunction with other studies on 20 August 1996 and 2–3 September 1997, after all surface-nesting species had completed breeding activities. Following the discovery of a storm-petrel chick during a low-effort search in 1996, we surveyed more thoroughly the following year. In 1997, nearly every rock in the colony complex suitable for nesting birds was landed on by at least one person, and accessible areas were searched for potential nesting habitat and nests of crevice-nesting seabirds. Small hand-held flashlights with bright halogen beams were used to illuminate dark crevices.

We mist-netted on the night of 2–3 September 1997 on two rocks: CRM-07 and HPR-02. On CRM-07, a four-tier 7-foot × 30-foot (2.1 × 9.2 m) mist net was stretched east–west across the middle of the rock. On HPR-02, a four-tier 7-foot × 18-foot (2.1 × 5.5 m) mist net was stretched east–west across a broad ledge about a third of the way up the south-facing side of the rock. Mist nets were open from 2026 to 0230 hr on CRM-07 and from 2045 to 0530 hr on HPR-02. Tapes of Ashy Storm-Petrel vocalizations were broadcast from portable cassette players to attract birds to the nets. Each captured bird was marked with a U.S. Geological Survey numbered leg band of incoloy, an alloy resistant to corrosion by salt water. We also examined the condition of the incubation (brood) patch, checked for body, primary, and rectrix molt, measured the lengths of the wing chord, tail, culmen, and tarsus, and recorded body mass. Birds were released immediately following examinations and, in a few cases, photographs were taken.

RESULTS

Ashy Storm-Petrel

On 20 August 1996, we discovered a downy storm-petrel chick in a rock crevice near the top of the west-facing cliff on HPR-02. The chick could not be reached for more thorough examination and species identification. However, from the late date, habitat, and location, we inferred the chick to have been an Ashy (cf. Ainley et al. 1974, Carter et al. 1992). Limited investigations of other rocks and mainland cliffs at Castle/Hurricane revealed petrel-like musky odors around crevices on CRM-07 but no other evidence of storm-petrel or auklet nesting.

On 2 and 3 September 1997, we found four storm-petrel nests at Castle/Hurricane: at BM-01, large shell fragments of one storm-petrel egg; at BM-02, one mostly downy chick; at CRM-03B, one adult incubating an egg; and at HPR-02, one unattended egg on 2 September and one adult incubating the egg on 3 September, in the same crevice as the 1996 nest. Both adults were easily identified as Ashy Storm-Petrels from their size, grayish brown plumage, and lack of a white rump (cf. Ainley 1995). They were not handled to minimize disturbance. Other storm-petrel nests were assumed to be of this species. The chick on BM-02 could not be pulled from its deep, narrow crevice to be examined for identifying marks. Nests on BM-01, BM-02, and HPR-02 were in crevices formed by rock fractures, and the nest on CRM-03B was under a boulder.

On the night of 2–3 September 1997, we captured 13 Ashy Storm-Petrels in mist nets: one on CRM-07, 12 on HPR-02. At CRM-07, wind may have hampered netting, but during the course of the capture period only one other bird was noted flying around the net. The net on HPR-02 was more sheltered from the northwest wind, which may have contributed to the

higher number of captures, although overall activity levels also were higher there. The incubation patches of captured birds indicated that most were breeding: two birds had downy or no patches, four birds had bare patches, and seven birds had refeathering patches. Downy incubation patches indicate nonbreeding birds, bare patches suggest incubating birds, and refeathering patches indicate birds with young (Ainley et al. 1974). Some nonbreeding adults and immature procellariids, however, also may develop a partial or complete incubation patch (Scott 1970, Warham 1990).

Cassin's Auklet

On 2 September 1997 we removed a whole but punctured all-white egg of a Cassin's Auklet from a large crevice set within the west-facing cliff of CRM-07. Cassin's Auklet eggs are larger than the all-white eggs of storm-petrels and smaller than the all-white eggs of the Rhinoceros Auklet (*Cerorhinca monocerata*) and Tufted Puffin (*Fratercula cirrhata*), which also breed in central California. Unfortunately, the egg broke shortly after being first examined and could not be saved for museum preparation. Other possible evidence of nesting by Cassin's Auklets was a crevice on CRM-04 that had pink guano at its entrance. Pink guano often indicates the consumption of euphausiids (Crustacea), a favorite prey item of Cassin's Auklets in California (Hunt et al. 1981, Ainley et al. 1990).

DISCUSSION

These observations documented the first known nesting of the Ashy Storm-Petrel and Cassin's Auklet in Monterey County, California. For the Ashy Storm-Petrel, Castle/Hurricane is the only known nesting location within an approximately 450-km stretch of coast between nesting centers at the South Farallon and Channel islands. For the Cassin's Auklet, this is only the second documented nesting location within that same coastal stretch; the other is the small recently established colony on Año Nuevo Island (Thayer et al. 1999). However, Castle/Hurricane probably is not a newly established colony for these species. Surveys of these nocturnal crevice- or burrow-nesting birds often require special efforts, including climbing and searching potential nesting habitat and mist-netting at night. All previous documented surveys at Castle/Hurricane (e.g., Sowls et al. 1980; Carter et al. 1992; Roberson and Tenney 1993; Parker et al. 1997; McChesney et al. 1999) were conducted from boats, the mainland, or from aircraft and thus were limited to diurnal species.

At Castle/Hurricane, auklets and storm-petrels nest in rock crevices like those at other colonies in central and southern California. Although we found other potential but unoccupied nest sites and did not search all habitats, suitable nesting habitat is not abundant, and populations of these species appear small. A rough estimate of 10 to 30 breeding pairs of Ashy Storm-Petrels is plausible given the numbers of nests and potential nest sites found, the number of mist-net captures, and other likely unsurveyed (i.e., inaccessible) habitat. For the Cassin's Auklet, we estimate one to five pairs in 1997 on the basis of a few potential crevice nest sites. Auklets also dig burrows for nesting; however, we found very little (if any) soil suitable for burrowing.

The coasts of Monterey and San Luis Obispo counties (as well as other parts of central California) contain many other offshore rocks and cliffs not unlike those at Castle/Hurricane. These areas have yet to be investigated for nocturnal seabirds because of their relative inaccessibility and the potential for detrimental disturbance to surface-nesting species such as Brandt's Cormorant (*Phalacrocorax penicillatus*). Given our findings at Castle/Hurricane, it is likely that small numbers of storm-petrels and auklets breed throughout this area, which may provide some limited connectivity between the major California nesting centers at the South Farallon and Channel islands. More broad-scale surveys are needed if the distributions and abundances of these species in this area are to be better described.

ACKNOWLEDGMENTS

We thank field assistants J. A. Boyce, E. B. McLaren, V. Collins, D. A. Nothhelfer, M. A. Ortwerth, S. E. Schubel, and R. J. Young. Logistic and other support was provided by the staff at the San Francisco Bay National Wildlife Refuge Complex, Humboldt State University, and U.S. Geological Survey. Permission to land and conduct surveys at Castle/Hurricane was provided by the California Department of Fish and Game, with assistance from P. R. Kelly and E. Burkett. Coastal access to launch boats was provided by the California Department of Parks and Recreation, with assistance from Kenneth Gray. Surveys were conducted jointly with other studies by the Common Murre Restoration Project, funded by the *Apex Houston* Trustee Council (comprising the U.S. Fish and Wildlife Service, National Oceanic and Atmospheric Administration, and California Department of Fish and Game). Valuable comments on an earlier version of the manuscript were provided by D. G. Ainley, J. A. Boyce, P. R. Kelly, and D. Roberson.

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Accepted 19 July 2000

(42)

S.C.A.N.
SONOMA COUNTY ABALONE NETWORK
P.O. BOX 3801 SANTA ROSA, CA 95402

December 13, 2004

Herrick E. Hanks
California Coastal National Monument
299 Foam Street
Monterey, CA 93940

Re: Sonoma County Abalone (SCAN) comments on
California Coastal National Monument
Draft Resources Management Plan/Draft
Environmental Impact Statement by the Bureau of Land
Management, U.S. Department of the Interior

Dear Mr. Hanks:

Please accept this brief response to the CCNM draft on behalf of the Sonoma County Abalone Network (SCAN). It is unfortunate that our organization has not been made aware of the plan progress until the November meeting in San Francisco. This leaves but a short period of study prior to the December 16 deadline for responses.

SCAN is a non profit (501 c3) established in 1995 for the sole purpose of the protection and enhancement of the north coast abalone resource. We have partnered with C.D.F.G. in creel surveys, enforcement support, education and public awareness programs. Our primary focus has been to assist C.D.F.G. in combating the rampant abalone poaching that has occurred during the last decade. Our membership is made up largely of fishermen, abalone divers and in general, recreational users of the marine environment.

The Sonoma County Abalone Network has many concerns on the administrative aspects of the management plan. Another layer of government control, duplication of efforts, funding sources and the complexity of management with core partners and other state, federal and local agencies all are of concern. 42-A

S.C.A.N. IS DEDICATED TO THE PROTECTION OF THE NORTH COASTAL MARINE ENVIRONMENT AND THE WISE MANAGEMENT OF THE ABALONE RESOURCE.

Herrick E. Hanks
Page 2
December 13, 2004

Time does not permit going into detail on the above, however, the use of vague and subjective terminology and the conclusory statements appearing throughout this plan will surely create challenges and litigation. 42-B

SCAN holds the position that restrictions based on subjective determination are totally unacceptable.

Our primary concern with the RMP is recreational access. The 1100 mile California coastline is an immense recreational opportunity for Californians. The ocean provides a vast area for public use and an important diversion from inland recreation and urban life. 42-C

The protection of marine wildlife and habitat is a noble and just cause, and we are supportive of this aspect. The cost, not only in dollars spent, but in restriction of recreational activities must be weighed with benefits, which may or may not be achieved by the plan. 42-D

State and federal regulations, California Fish & Game regulations as they are now written seem adequate. Fish & Game regulations as applied to abalone harvest have produced a sustainable abalone fishery on the north coast. Recent Fish & Game code revisions have resulted in daily bag and yearly limit reductions which will further contribute to sustainability of the north coast abalone resource. 42-E

The R.M.P. clearly states that existing regulations will be utilized and that no new regulations will be required, except, *"seasonal access restrictions in some locations may be used by BLM and its core partners to protect sensitive populations." Further, BLM has the ultimate responsibility for the CCNM and its management. As such it will serve as the final decision making authority for actions on the monument."* 42-F

It would seem that there is ample room for jurisdictional conflict with such language. The plan speaks of encouraging *"recreational pursuits in the vicinity of CCNM rocks and islands that do not disturb wildlife" and provides, "appropriate access for visitors while insuring that sensitive resources are protected."* How will this be accomplished? How will "sensitive" areas be identified? 42-G

"Low impact recreation", "limited use", "sensitive resources" are based upon subjective determination and can have a broad application in implementation. This is especially of concern when funding for adequate scientific research is not available, as is the present case. This often leads to an over cautious approach resulting in unnecessary closures and restrictions. 42-H

It is also noted that the nesting and pupping periods for sea birds and pinnipeds, roughly April through August, is in direct conflict with abalone season and other near shore fishing, boating and kayaking activities. 42-I

Herrick E. Hanks
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December 13, 2004

SCAN sides with other recreational stakeholders and can foresee opportunities for those who support fishing closures and no-take areas due to the plan's broad use of "protective" language. 42-J

Alternative A, the preferred alternative in our judgment, is not balanced management. It emphasizes protection of sea birds and mammals and supports "low-impact" recreation. Low-impact, again is a subjective term that is open for interpretation. There is no balance here. 42-K

It is unfortunate that I do not, at this time, have access to the scoping report. If this is a printed document I would be pleased to obtain a copy (mail to address on letterhead).

As a recreational stakeholder, SCAN is most concerned with the potential loss of recreational opportunities on the California coast. CDFG has a pending abalone recovery and management plan (ARMP), the Marine Life Protection Act (MLPA) and pending MPA's all will result in loss of fishing opportunities. 42-L

SCAN supports the use of reserves in managing the fishery resource. Reserves, however, should be based upon hard scientific data and implemented only by due process. 42-M We, as sport fishermen, contribute greatly to the overall protection and enhancement of marine resources. Recreational users/fishermen/divers/boaters, etc. are major stakeholders and should be reflected as such in the plan. 42-N

It has been stated that the final document is scheduled for release in the spring of 2005. We would be pleased to discuss further the issues stated herein and would like to be included in any discussions or actions that take place prior to final release.

I thank you for the opportunity to contribute these comments.

Sincerely,

M. George Lawry

M. George Lawry
President, Sonoma County Abalone Network (SCAN)

pc: Ryan Brodderick, Director, CDFG
Robert Treanor, Executive Director, California Fish & Game Commission
Mike Thompson, U.S. Representative

STATE OF CALIFORNIA – THE RESOURCES AGENCY ARNOLD SCHWARZENEGGER, GOVERNOR
CALIFORNIA COASTAL COMMISSION
45 FREMONT, SUITE 2000
SAN FRANCISCO, CA 94105-2219
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43

December 13, 2004

Herrick E. Hanks
Monument Manager
California Coastal National Monument
Bureau of Land Management
299 Foam Street
Monterey, CA 93940

Subject: Draft Resource Management Plan/Draft Environmental Impact Statement for the California Coastal National Monument

Dear Mr. Hanks:

The Coastal Commission staff has reviewed the above-referenced document prepared by the Bureau of Land Management (BLM) for the California Coastal National Monument (CCNM) and submits the following comments. Our comments focus primarily on "Alternative A – Balanced Management" (the BLM's preferred alternative) of the Draft Resource Management Plan/Draft Environmental Impact Statement, and on the Commission's federal consistency authority provided under the federal Coastal Zone Management Act (CZMA).

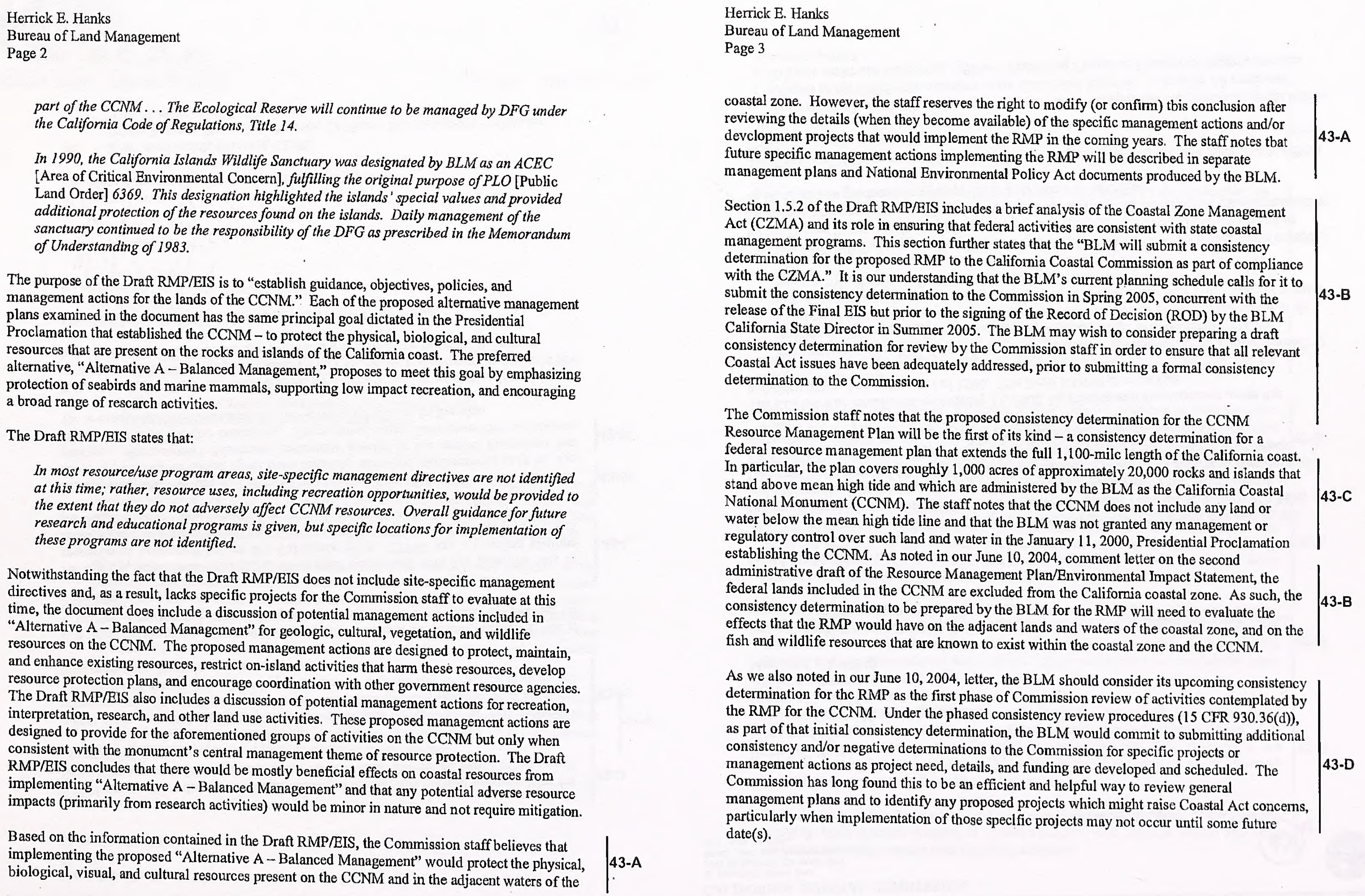
The CCNM was established on January 11, 2000, by Presidential Proclamation under the authority of the Antiquities Act of 1906. The Draft RMP/EIS notes that:

> *The purpose of the CCNM, as stated in the Presidential Proclamation, is to protect and manage biological and geological resources by protecting "all unappropriated or unreserved lands and interest in the lands owned or controlled by the United States in the form of islands, rocks, exposed reefs, and pinnacles above mean high tide within 12 nautical miles of the shoreline of the State of California."*

The Draft RMP/EIS also notes that the rocks and islands of the CCNM are public lands owned by the United States which are (or have been at one time) public domain lands as a result of California being ceded to the United States in 1848 and have since been under the administration of BLM and its predecessor agency, the U.S. General Land Office.

The Draft RMP/EIS reviews existing designations covering the subject rocks and islands off the California coast:

> *On August 27, 1988, the California Fish and Game Commission designated all areas within ½ mile of the California coastline as an Ecological Reserve . . . As such, all rocks and islands within the California Offshore Rocks and Pinnacles Ecological Reserve are also*



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> *part of the CCNM . . . The Ecological Reserve will continue to be managed by DFG under the California Code of Regulations, Title 14.*
>
> *In 1990, the California Islands Wildlife Sanctuary was designated by BLM as an ACEC* [Area of Critical Environmental Concern], *fulfilling the original purpose of PLO* [Public Land Order] *6369. This designation highlighted the islands' special values and provided additional protection of the resources found on the islands. Daily management of the sanctuary continued to be the responsibility of the DFG as prescribed in the Memorandum of Understanding of 1983.*

The purpose of the Draft RMP/EIS is to "establish guidance, objectives, policies, and management actions for the lands of the CCNM." Each of the proposed alternative management plans examined in the document has the same principal goal dictated in the Presidential Proclamation that established the CCNM – to protect the physical, biological, and cultural resources that are present on the rocks and islands of the California coast. The preferred alternative, "Alternative A – Balanced Management," proposes to meet this goal by emphasizing protection of seabirds and marine mammals, supporting low impact recreation, and encouraging a broad range of research activities.

The Draft RMP/EIS states that:

> *In most resource/use program areas, site-specific management directives are not identified at this time; rather, resource uses, including recreation opportunities, would be provided to the extent that they do not adversely affect CCNM resources. Overall guidance for future research and educational programs is given, but specific locations for implementation of these programs are not identified.*

Notwithstanding the fact that the Draft RMP/EIS does not include site-specific management directives and, as a result, lacks specific projects for the Commission staff to evaluate at this time, the document does include a discussion of potential management actions included in "Alternative A – Balanced Management" for geologic, cultural, vegetation, and wildlife resources on the CCNM. The proposed management actions are designed to protect, maintain, and enhance existing resources, restrict on-island activities that harm these resources, develop resource protection plans, and encourage coordination with other government resource agencies. The Draft RMP/EIS also includes a discussion of potential management actions for recreation, interpretation, research, and other land use activities. These proposed management actions are designed to provide for the aforementioned groups of activities on the CCNM but only when consistent with the monument's central management theme of resource protection. The Draft RMP/EIS concludes that there would be mostly beneficial effects on coastal resources from implementing "Alternative A – Balanced Management" and that any potential adverse resource impacts (primarily from research activities) would be minor in nature and not require mitigation.

Based on the information contained in the Draft RMP/EIS, the Commission staff believes that implementing the proposed "Alternative A – Balanced Management" would protect the physical, biological, visual, and cultural resources present on the CCNM and in the adjacent waters of the **43-A**

Herrick E. Hanks
Bureau of Land Management
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coastal zone. However, the staff reserves the right to modify (or confirm) this conclusion after reviewing the details (when they become available) of the specific management actions and/or development projects that would implement the RMP in the coming years. The staff notes that future specific management actions implementing the RMP will be described in separate management plans and National Environmental Policy Act documents produced by the BLM. **43-A**

Section 1.5.2 of the Draft RMP/EIS includes a brief analysis of the Coastal Zone Management Act (CZMA) and its role in ensuring that federal activities are consistent with state coastal management programs. This section further states that the "BLM will submit a consistency determination for the proposed RMP to the California Coastal Commission as part of compliance with the CZMA." It is our understanding that the BLM's current planning schedule calls for it to submit the consistency determination to the Commission in Spring 2005, concurrent with the release of the Final EIS but prior to the signing of the Record of Decision (ROD) by the BLM California State Director in Summer 2005. The BLM may wish to consider preparing a draft consistency determination for review by the Commission staff in order to ensure that all relevant Coastal Act issues have been adequately addressed, prior to submitting a formal consistency determination to the Commission. **43-B**

The Commission staff notes that the proposed consistency determination for the CCNM Resource Management Plan will be the first of its kind – a consistency determination for a federal resource management plan that extends the full 1,100-mile length of the California coast. In particular, the plan covers roughly 1,000 acres of approximately 20,000 rocks and islands that stand above mean high tide and which are administered by the BLM as the California Coastal National Monument (CCNM). The staff notes that the CCNM does not include any land or water below the mean high tide line and that the BLM was not granted any management or regulatory control over such land and water in the January 11, 2000, Presidential Proclamation establishing the CCNM. **43-C** As noted in our June 10, 2004, comment letter on the second administrative draft of the Resource Management Plan/Environmental Impact Statement, the federal lands included in the CCNM are excluded from the California coastal zone. As such, the consistency determination to be prepared by the BLM for the RMP will need to evaluate the effects that the RMP would have on the adjacent lands and waters of the coastal zone, and on the fish and wildlife resources that are known to exist within the coastal zone and the CCNM. **43-B**

As we also noted in our June 10, 2004, letter, the BLM should consider its upcoming consistency determination for the RMP as the first phase of Commission review of activities contemplated by the RMP for the CCNM. Under the phased consistency review procedures (15 CFR 930.36(d)), as part of that initial consistency determination, the BLM would commit to submitting additional consistency and/or negative determinations to the Commission for specific projects or management actions as project need, details, and funding are developed and scheduled. The Commission has long found this to be an efficient and helpful way to review general management plans and to identify any proposed projects which might raise Coastal Act concerns, particularly when implementation of those specific projects may not occur until some future date(s). **43-D**

Herrick E. Hanks
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Based on the contents of the Draft RMP/EIS, the BLM should plan to submit future consistency and/or negative determinations to the Commission for projects and management actions that hold the potential to: (1) restrict existing public access and recreational activities on the CCNM or in/on adjacent waters and lands; (2) adversely affect existing public views to and along the shoreline; (3) restrict existing commercial and recreational fishing in waters adjacent to the CCNM; (4) adversely affect cultural resources or traditional Native American activities on the CCNM or on/in adjacent lands and waters; (5) adversely affect environmentally sensitive habitats; or (6) adversely affect marine and/or terrestrial wildlife resources on the CCNM, and which are assumed to also use adjacent waters and lands. 43-D

Thank you for the opportunity to comment on the Draft RMP/EIS. The Commission staff looks forward to working with BLM staff on the upcoming federal consistency determination to be prepared for the California Coastal National Monument Resource Management Plan. Please contact me at (415) 904-5288 should you have any questions regarding this matter.

Sincerely,

LARRY Simon

Larry Simon
Federal Consistency Coordinator

44

California Coastal National Monument
RMP Response Form

For public input on the Draft California Coastal National Monument Resource Management Plan and Draft Environmental Impact Statement

Note: All items must be completed for form to be accepted

Today's Date: 14 Dec 2004

Your name (please print): Mendocino Coast Audubon Society, Warren F. Wade, President

Representing (put an X in one box only):

☐ Self only

☒ Business, [✓ organization] or agency (specify): Mendocino Coast Audubon Society

Address: Post Office Box 2297

City: Fort Bragg

State: CA Zip: 95437 Phone: 707-964-6362

Email (optional): wwade@mcn.org

Important Privacy Notice: Under the Freedom of Information Act, all written comments, including names and street addresses, will be available for public review upon request and may be published by the BLM during the planning process. As an individual, however, you can ask us to withhold your name and address. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety. If you checked "self only" above, and would like us to withhold your name, put an X in this box: ☐

Comments on the California Coastal National Monument Draft RMP/Draft EIS:

We have read through the RMP for the Monument, and find it to be impressive in its scope and thoughtfulness. We know this formulation represents a large investment of time and money for the BLM. We would like to help you make it the very best plan possible for this new National Monument. The suggestions that we offer will be directed mainly to wildlife issues, and may apply somewhat more to the rocky coast of Northern California than to the rather different coast of Southern California. 44-A

As do the Plan's authors, we prefer most of the features of Alternative A. We are particularly pleased to see its emphases on ongoing research and monitoring, and on public education and interpretation. Both of these features are relatively lacking in Alternative B.

(continued on next page)

Mail form to:
California Coastal National Monument
299 Foam Street
Monterey, CA 93940

Or Fax to: (831) 647-4244

Continue your comments on the back of this page, or on additional pages

We have considerable misgivings, however, about the possibility of public access being permitted on the monument before you have completed your proposed inventory of the distribution and status of birds and mammals. We also have misgivings about the feasibility of seasonal closure (which implies an open season part of the year) on parts of the Monument. If you plan to protect nesting areas, roosting areas, and pupping areas, you will need to close most North Coast islands, islets, and rocks about eight months of the year. **44-B** As one example, perhaps the most protracted, Ashy Storm-Petrels (which nest on the Van Damme rocks [1]) have egg dates from May to October, and chick dates from late June to mid-January, according to your own table on 2-26. It has been our experience that many bird species colonize new islands and rocks and abandon old ones, either temporarily, or for long periods. Brown Pelican roosting areas shift from place to place, even within the same year. The pelicans stay on the North Coast from about mid-April through December, and sometimes longer. Pelagic and Brandt's Cormorants roost in a number of places throughout the year. **44-C**

As you point out in several places, most of the human access to the Monument along the North Coast occurs in connection with kayaking, or scuba- and free-diving. These activities are pursued for the most part during the same months of the year that nesting and pupping happen. We think it would be more beneficial, more practical, and more enforceable to close the Monument in its entirety to human access, except for emergencies, maintenance of navigational aids, permitted research activities, and established subsistence harvesting of seaweed, shellfish, etc. In general, confining human activity to mainland interpretive centers and scenic overlooks seems ideal. Once the proposed inventory is completed, perhaps a few island locations would prove feasible for the kinds of guided eco-tourism to which you refer in a number of places. **44-D**

On the same point, it concerns us that you refer to "restricting" recreational activities on the Monument during nesting and pupping seasons, rather than prohibiting them. We also find the several references to "special events with a permit" disquieting, as special events often equal large numbers of visitors, and will inevitably result in physical and ecological damage to the Monument. We strongly recommend that no special events be permitted on the Monument particularly on the North Coast. **44-E**

Finally, we would like to suggest that you add kite flying to your prohibited on-island activities, as kites overhead may cause birds to flush from their nests and/or roosts. **44-F**

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[1] "Important Bird Areas of California", Daniel S. Cooper, Audubon California, 2004. p.150

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(45)

Leland Lewis
P.O. Box 46
Carmel, CA 93921-0046

15 December 2004

United States Department of Interior
Bureau Of Land Management
CALIFORNIA COAST NATIONAL MONUMENT
299 Foam Street
Monterey, California 93940

REF: 1610.4-7(P) CA 939 Draft RMP/Drafty EIS for CCNM

Attention: Herrick E. Hanks
Monument Manager

Dear Rick:

I thoroughly appreciated your recent presentation of the work in progress delineating the proposed program for administering the Coastal Monument. I felt it was thoroughly organized and professionally rendered. You asked for contributory input by December 16th, 2004. I offer the following suggestion:

Incorporate oblique aerial photographs of the individual major rocks, islets, reefs for your study (black & white will do admirably) ; call out their published geographic descriptions and include local, historic names (Spanish, colloquial, fishermen's anchorages).

Many, if not all, of these aerial photographs are available from State of California files . I have contributed many 11 x 20 B&W prints from material assembled for the publication of my several books on the coast of the Californias (SEA GUIDE -Volume I (three edition). I will be happy to reference you specifically if you think this idea is worth pursuing. **45-A**

My books are considered the standard in the field and are quite popular among coastal sea going people. Your final report (with such illustration) would excite a significant demand for copies useful for a multitude of purposes. Such an illustrated publication would support and adequate subscription fee to more than cover the additional cost of printing and publication. **45-B**

Call me if you wish to discuss the approach and process I employed in implementing the aerial photographic illustration as well as the ready sources for the material.

Cordially,
Leland R. Lewis
Leland R. Lewis
(831) 624-2157
FAX 624-3266

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEAN SERVICE
Monterey Bay National Marine Sanctuary
299 Foam Street
Monterey, California 93940

46

December 15, 2004

Mr. Rick Hanks
Manager
California Coastal National Monument
Monterey, California 93955

SUBJECT: MBNMS and GFNMS Comments on CCNM Draft Resource Management Plan

Dear Mr. Hanks:

Thank you for the opportunity to provide comments to the Bureau of Land Management (BLM) on the California Coastal National Monument (CCNM) Draft Resource Management Plan (RMP). The RMP describes and analyzes a range of alternatives for managing the CCNM rocks, islands, pinnacles, and exposed reefs off the coast of California. The purpose of the RMP is to establish guidance, objectives, policies, and management actions for the public lands of the CCNM administered by the BLM.

The Monterey Bay National Marine Sanctuary (MBNMS) and Gulf of the Farallones National Marine Sanctuary (GFNMS) are Federally protected marine areas offshore of California's central and northern coast. The MBNMS encompasses a shoreline length of 276 miles and 5,322 square miles of ocean, and was established for the purpose of resource protection, research, education, and public use. The GFNMS encompasses 948 square nautical miles of nearshore and offshore waters, and was established in 1981 for the improved protection of seabirds and marine mammals, multiple uses of the ocean, a management-oriented research program, and an education and public outreach program. Within the boundaries of the MBNMS and GFNMS lie not only some of the most productive ecosystems in the world, but also many of the most spectacular resources of the CCNM.

While the Monterey Bay and Gulf of the Farallones National Marine Sanctuaries encompass the resources that lie below the ocean's surface up to the mean high tide level, the CCNM includes those that are located above the mean high tide line. This important intertidal connection between the resources above and below the surface of the water provides a natural opportunity for partnerships and collaboration among our respective agencies. For example, there are numerous management initiatives that we can work together on through collaborative partnerships involving research and monitoring, resource protection, and education and outreach. By working together and pooling resources, we can better achieve our common goals of long-term protection of the resources. 46-A

Research and Monitoring:
The MBNMS and GFNMS are very supportive of the emphasis identified in the RMP on conducting a site assessment as a critical step, in order to better understand the resources. We believe that the site characterization mentioned in the RMP will be vital in building upon the framework that is identified in this plan and in identifying the initiatives that will be key to ensuring the long-term protection of the monument. A thorough site characterization will greatly enhance the development of effective resource management strategies. By first determining where the resources are located, how they are being used, what plants and animals utilize them, and if and how they are being impacted, we can then have a knowledge base with which to make informed and effective decisions. This information will serve as a baseline —providing a reference point when assessing the health and status of the monument in the future. It will also help to prioritize efforts and limited resources for future management. 46-B

The resources of the CCNM clearly represent an enormous research value. Seabird colonies that utilize monument resources in particular are a precious resource in need of additional research and protection. The geological formations of the monument are extremely important for many seabird colonies; in fact certain species depend exclusively on these rocks as their roosting and nesting habitats. Additionally, many of the rocks of the CCNM provide an excellent "control" for research studies comparing human access versus non-access areas since there is very limited or no public access to many of the rocks. By studying these areas, we can gain a better understanding of the potential impacts, both physical and biological, that public access may bring. 46-C

The MBNMS and GFNMS encourage strong coordination with other scientific institutions and agencies regarding research activities. The CCNM can play an important role in helping coordinate the various research and monitoring projects being conducted in the vicinity of the monument. The CCNM can also facilitate new research by working with scientists and research institutions to identify gaps in information about the resources of the monument, and coordinate with researchers to address those research gaps so that we can gain a better understanding of the rocks and islands, and the biological resources that depend on them. It is also important once the information is compiled and analyzed, that the findings be effectively disseminated to policy makers and others that can benefit from it. We recommend that the CCNM coordinate with the MBNMS and GFNMS during all stages of the site characterization process. One effective way of linking with the scientific research community of the central California coast is through continued involvement in the MBNMS Research Activity Panel; another way is to link up with the GFNMS Sanctuary Advisory Council and Research Working Group. 46-D

The sanctuaries have information that would likely be helpful in better understanding those CCNM resources located within the boundary of the sanctuaries, and can also assist in the identification and development of other partnerships within the scientific community. For example, much of the habitat characterization data for the areas between Point Arena and Point Sal are now available in the sanctuaries' Biogeographic Atlas. This Atlas is currently being updated in collaboration with MBNMS, GFNMS, Cordell Bank National Marine Sanctuary and US Fish and Wildlife Service to include habitat characterization and seabird colony counts for most the CCNM rocks within this large area.

As you are aware, the MBNMS has developed an integrated long-term program called the Sanctuary Integrated Monitoring Network, or SIMoN, which takes an ecosystem approach to identifying and understanding changes to the sanctuary. SIMoN enables researchers to monitor the sanctuary effectively by integrating the existing monitoring programs and identifying gaps in information. SIMoN also serves as a center for initiating and integrating data collecting efforts and for disseminating information, striving to make the monitoring data available to managers, decision makers, the research community, and the general public through an interactive website. The SIMoN program is being expanded to other sites within the National Marine Sanctuary Program including the GFNMS. CCNM has already begun a relationship with SIMoN through the sharing of office space and GIS data and submittal of a summary characterization of the rocks and islands habitat along the California coast, and we encourage the continuation of this relationship. SIMoN may be a very useful tool for the CCNM in identifying existing monitoring efforts and data for the CCNM site characterization, as well as a tool for disseminating information once the characterization has been completed. It may also serve as a good model for the development of a similar program specific to the resources of the CCNM. 46-E

Wildlife Disturbance:
One of the strongest connections between the sanctuaries and the CCNM is the wildlife that inhabits each, particularly the seabirds and marine mammals that spend time both on the rocks and islands and the water surrounding them. Furthermore, with our common mandates to protect biological resources, disturbances of seabirds, marine mammals, and other wildlife are of a mutual high concern. This is an issue that both the GFNMS and MBNMS are playing an increasing role in addressing. There are many opportunities for us to combine our efforts in order to more effectively address these issues on a larger ecosystem scale than we can individually, by focusing beyond our respective boundaries. We welcome the CCNM as a partner in both our own site-specific programs as well as the general issue of wildlife disturbance. 46-F

The CCNM would benefit greatly from the development of inventories of the species that utilize the monument's resources, as well as additional information on any adverse effects on these species from human activities on or near the monument. This information will be crucial in identifying sensitive wildlife resource areas and developing criteria for identifying resources requiring protection and management. 46-G When considering management options it will be essential to consult with the sanctuaries and other relevant local state and federal agencies, as well as a range of stakeholders. 46-H Considerations for management measures should include working with partners in establishing buffer zones around particularly sensitive CCNM resources. Such buffer zones would not only protect wildlife but also may prevent other significant impacts such as accidental vessel groundings. The sanctuaries have information on many of the monument's rocks, particularly within the GFNMS, that may be important in identification of sensitive resources requiring additional protection (see the Biogeographic Atlas for further information). 46-I

Many of the wildlife disturbance issues mentioned in the RMP are currently being addressed by the MBNMS and GFNMS. These include disturbances caused by low overflights of aircraft, and disturbance by motorized boats, sailboats, kayaks, motorized personal watercraft and other forms of recreation. The GFNMS and MBNMS are addressing these issues of mutual concern through the development and implementation of comprehensive action plans, volunteer programs, and other initiatives aimed at minimizing disturbances through interpretive enforcement. The sanctuaries encourage the CCNM to join our efforts and utilize non-regulatory as well as regulatory approaches in addressing the issue of wildlife disturbance. The MBNMS Team OCEAN, and GFNMS S.E.A.L.S. programs on Tomales Bay, are examples of successful non-regulatory efforts designed to minimize impacts to sanctuary resources, that could also benefit CCNM resources. 46-J

The National Marine Sanctuary Program (NMSP) has been working with NOAA Fisheries in developing a handbook called *Responsibly Watching California Wildlife*. The purpose of this handbook is to provide California's ocean users, including boaters, fishermen, wildlife watchers, kayakers, and whale watching and nature-tourism operators with clear and concise information about existing federal and state laws pertaining to California's marine wildlife and general agency accepted marine wildlife responsible viewing and stewardship principles. The goals of this handbook are to: promote voluntary compliance with existing federal and state wildlife protection laws and regulations; raise public awareness among California's ocean user groups and visitors about responsible viewing and stewardship principles; and promote communication and coordination between and among California's ocean user groups and the federal and state agencies responsible for marine wildlife protection and conservation. On page 41 of the handbook the CCNM is listed as one of California's marine and coastal protected areas. We urge the CCNM to stay in contact with the NMSP and NOAA Fisheries as this document evolves. This effort could provide valuable information and outreach opportunities for the CCNM. We encourage the BLM to collaborate with this and other sanctuary programs that address disturbances to wildlife, when developing a resource protection plan for the CCNM. 46-K

The sanctuaries encourage the CCNM to coordinate with and participate in the development of marine protected areas (MPAs) including "no-take" marine reserves to be established under the California Marine Life Protection Act, as well as any sanctuary efforts to consider marine reserves. The resources of the CCNM are integrally linked with the marine ecosystems that may be under consideration for additional protection; CCNM protection in the form of terrestrial reserves could provide valuable habitat for wildlife. This important land-sea connection should be taken into account, and the rocks and islands of the CCNM should be carefully considered when identifying and evaluating potential MPA locations. By compiling and providing information on its geological and biological resources, the CCNM could be a valuable contributor to any MPA designation effort. 46-L

Education is a valuable tool for addressing wildlife disturbance in the CCNM. Through the development of effective signage and other interpretive materials aimed at recreational users, it is possible to prevent disturbances. We encourage the use of signage and other education and outreach strategies that not only educate people about the resources and mission of the CCNM, but also strategies that focus on "interpretive enforcement" by providing information about the threats and presence of sensitive resources. In our experiences we have found that interpretive enforcement is not only a very effective and well-received strategy, but it also tends to reinforce positive behaviors in terms of wildlife viewing experiences. Educational efforts focused on recreational users of the monument can be very successful in minimizing wildlife disturbances and other impacts to the resources. We encourage CCNM to engage a variety of recreational users as ambassadors for the monument, to help educate other users. In addition to the signage aimed at recreational users, mentioned in the RMP (page 2-30), the sanctuaries encourage the 46-M development of signage that also informs these visitors about sensitive wildlife areas and provides information on why these areas should be avoided. This information could be incorporated into a number of brochures and other products produced by the CCNM and its partners. 46-M

Interagency Coordination & Big Sur Planning Efforts:
The Big Sur region is a remote but sensitive ecosystem where relatively little is known about the coastal and marine habitats and processes. This provides a unique opportunity and responsibility for collaboration between land and ocean oriented institutions on research and monitoring activities as well as resource protection strategies. The CCNM is one of a number of agencies developing collaborative plans to protect the Big Sur coastal ecosystem. CCNM has been a participant in the development of the MBNMS Big Sur Coastal Ecosystem Plan, which will increase communication between the public and agencies with jurisdiction in the Big Sur coastal region, improve agency coordination, and provide enhanced protection and management of coastal and marine resources. We encourage the CCNM to continue its involvement and be an active partner in the implementation of the MBNMS Big Sur Coastal Ecosystem Plan. As it is developed, we encourage the CCNM to provide data from its resource inventory to assist with oil spill response, and collaborate in identifying sensitive resources and prioritizing response needs for the Big Sur region and throughout the California coastline. 46-N

Education and Outreach:
One of the major challenges for the BLM will be making the public aware of the existence and mission of the CCNM. Through education, the CCNM can share information about the status of the resources and ultimately help protect the resources of the CCNM by inspiring stewardship and conservation. For the MBNMS and GFNMS, education is a major focus of our management strategies. Since these sites were designated we have built successful education and outreach programs and we are willing to share our approaches and techniques, and materials with you. There is an excellent opportunity for coordinated education and outreach efforts and potential cost sharing opportunities with signage and interpretive facilities. In addition to the education programs of the MBNMS and GFNMS, there are a wide array of other existing education programs and facilities for the California coast. We encourage the CCNM to link its own education efforts not only with National Marine Sanctuary education programs, but also with other programs as well. 46-O

We encourage the CCNM to conduct inventories, such as the ones mentioned in the RMP, of existing coastal facilities that could serve as points of visitor contact, and of existing education programs that may serve as partners. The MBNMS has a very active education network, the Sanctuary Education Panel (SEP). The Panel is comprised of both formal and non-formal marine educators from a variety of agencies, non-profits, universities, and school districts. We strongly recommend that the CCNM pursue membership on the SEP to facilitate in introducing the monument to the public, and to acquire assistance in the CCNM's education planning process. 46-P

Interpretive facilities and signage can be an extremely effective and efficient means of educating the public about the resources of the CCNM. Located in strategic locations, signs can provide relevant and pertinent information to a visitor that can contribute towards the CCNM's goal of fostering an appreciation and stewardship of natural and cultural resources. Currently the CCNM 46-Q

is included in the signage plan for the Pigeon Point Light Station, and we anticipate that signage to be up by the end of 2005. We welcome further collaboration with the CCNM at sanctuary signage locations along the California coast. The four California sanctuaries are currently involved in an initiative called the California Signage Plan, which involves working collaboratively among the sanctuaries and with partners to develop interpretive signage. As part of this plan, we have developed strong partnerships with the California State Parks system, and are currently working on an official agreement that would focus specifically on interpretive signage between these two agencies and would establish a broad framework for joint participation among the parties for interpretative signs within the California State Parks system. The sanctuaries and State Parks will collaborate to convey to the public the biological, economic, aesthetic, and cultural values of the environment around them. This signage effort is the initial phase in a plan, which will eventually expand to development of exhibits and facilities. The sanctuaries are interested in expanding these collaborations to involve other agencies, and we welcome the involvement of the CCNM in the further development and implementation of this plan. 46-Q

An effective education program must consider the target audience it is trying to reach. In the case of California that audience is very diverse, and any effective education and outreach strategies need to reflect that diversity. The sanctuaries encourage BLM to consider multicultural education strategies as a major component of its overall education focus. In response to the changing demographics of California, the MBNMS has developed a comprehensive multicultural education plan named Multicultural Education for Resource Issues Threatening Oceans (MERITO). The MERITO program has the goal of increasing our diverse community's understanding of the ocean related threats within the MBNMS, and to be a long-term element in affecting change in individual behavior. Its initial target audience is California's rapidly growing Hispanic population, however, with further funding the program could expand to other cultural groups as well. This program is currently operating in MBNMS and CINMS, and will be expanded to the GFNMS and other sites in the near future. MERITO has established community programs addressing marine conservation through the land-sea connection. The CCNM in partnership with MERITO could use these venues as a means for disseminating information adapted to reach specific cultural groups. Through assessment of priority issues and translation of appropriate information the CCNM could reach a much broader audience than otherwise possible. MERITO could provide a model for how CCNM could develop a multicultural education and outreach plan of its own. 46-R

The sanctuaries also encourage the CCNM to pursue the use of technology for education, through programs such as the Internet based "Virtual Monument" which was mentioned in the RMP. The National Marine Sanctuary Program is aggressively pursuing the use of modern technologies to further its mandates of education, outreach, research and monitoring. One of the promising new concepts being embraced by the sanctuaries is telepresence, or the use of remotely operated video cameras both above and below the waters. In addition to enhancing public outreach, awareness and education, telepresence is also a highly useful tool for biological monitoring as well as documentation of impacts for disturbances. We hope to expand this program and see natural opportunities with the CCNM for collaboration and cost sharing on the installation of video cameras on significant monument resources. 46-S

In addition to the objectives listed under education we recommend including fostering stewardship of CCNM resources. Through education we can reach the ultimate goal of resource protection by minimizing future impacts. This concept is apparent in the CCNM Mission Statement, however it does not come across in the education objectives listed on page 2-32 of the RMP. Since education is one of the fundamental and most effective means of inspiring people to become good stewards, this should be reflected directly in the objectives. 46-T

Cultural Resources:
The CCNM and Monterey Bay and Gulf of the Farallones National Marine Sanctuaries share a common mandate to protect not only the biological and geologic resources, but cultural resources as well. We encourage the development of a CCNM Cultural Resources Management Plan as described in the RMP. The MBNMS and GFNMS have developed a cross-cutting Maritime Heritage Action Plan that will be implemented collaboratively by both sites. The plan sets out a framework to develop a Maritime Heritage Resources Program for both sanctuaries. Program efforts will include: conducting paleo-ecological and archeological studies; inventorying, locating, and monitoring both historic shipwrecks and those that pose an environmental threat to the sanctuaries; and protecting and characterizing heritage resources. The plan will also address Native American and fishing communities and other traditional user groups that are connected with the sanctuaries. An important focus of both the CCNM cultural resources program as described in the RMP and the sanctuaries' program will be not only preservation of the cultural resources, but also a strong emphasis on education and outreach. With the obvious links between both of our mandates and resources, we should work together to identify opportunities to collaborate on these aspects. 46-U

Environmental Emergency Response and Enforcement:
CCNM site characterization information can be very useful in gaining a better understanding of the sensitive resources of the monument. By providing important information about the natural resources at risk within CCNM jurisdiction to those involved in response to oil spills and other environmental emergencies, responders can use that information to prioritize and help guide response activities. In regard to oil spills, this information exchange should occur in the planning stage by incorporating it into U.S. Coast Guard Area Contingency Plans. 46-V

Vessel groundings are an issue of mutual concern to the sanctuaries and the CCNM. These incidents can have both acute and long-term negative impacts. In fact, the salvage of the vessel itself can cause as much damage as the grounding incident, depending upon the method selected and physical constraints of the site. By collaborating with the sanctuaries and other appropriate agencies, the CCNM could play a valuable role in responding to vessel groundings, associated spills, and vessel salvage operations, through the sharing of information. Furthermore, through detailed information about the monument's resources, we can gain valuable insight to aid natural resource damage assessment and restoration efforts, following a grounding event. 46-W

With limited resources, enforcing any regulations regarding the CCNM is a very challenging task. By working within existing enforcement regimes and pooling efforts, enforcement can be much more effective. We recommend investigating partnerships with sanctuary and other agencies' enforcement programs, particularly with those involving coastal patrols. The sanctuaries encourage the CCNM to develop a collaborative enforcement program that works 46-X

Thank you for consideration of these comments. We look forward to building upon valuable existing partnerships in the future as the CCNM continues to develop its resource management strategies. Through collaborative partnerships we can better achieve our common goals of protecting the resources. For more information, please contact Brad Damitz (MBNMS) at 831-647-4252; or Karen Reyna (GFNMS) 415- 561-6622 x208.

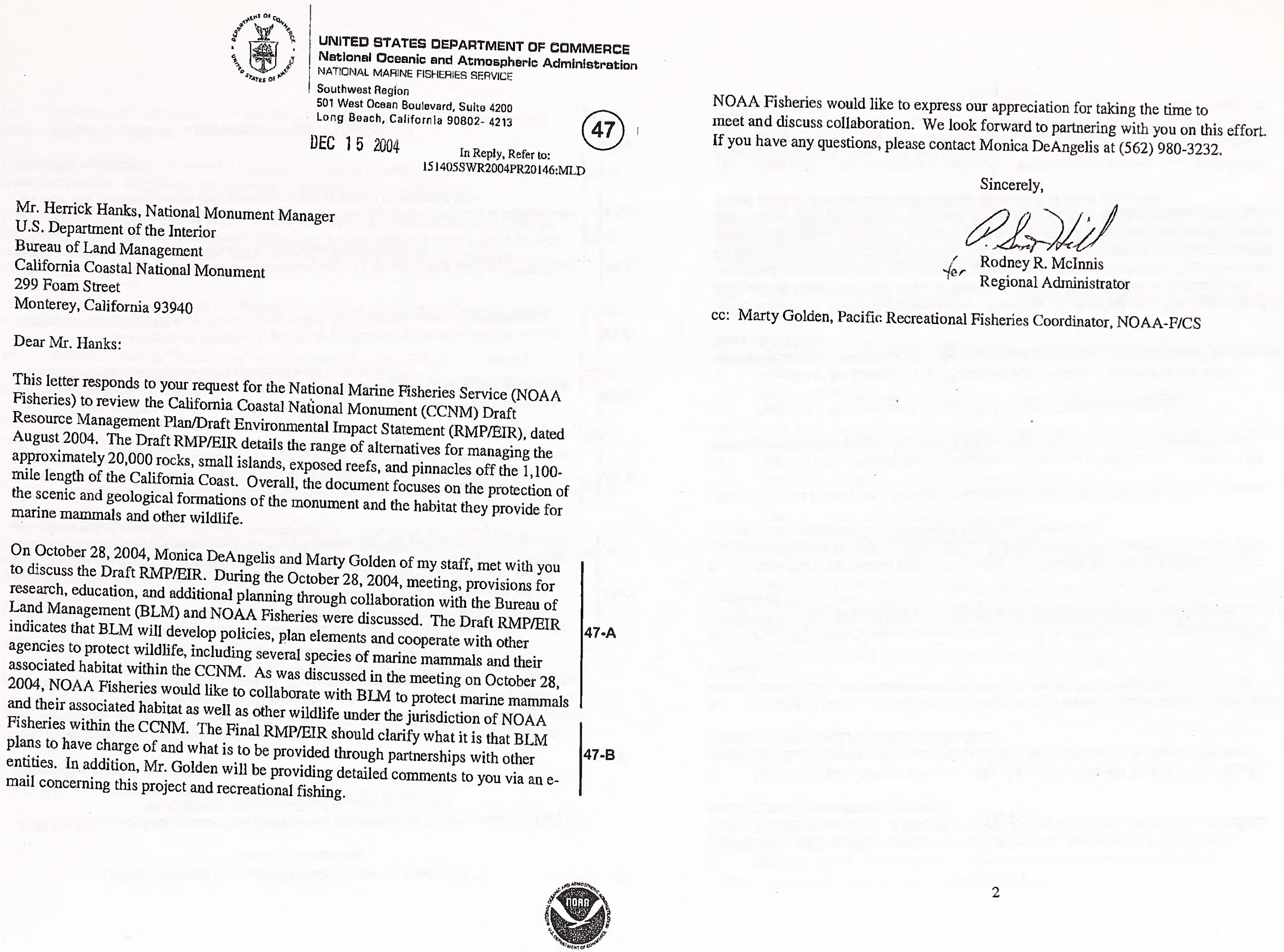
Sincerely,

Holly Price

Dr. Holly Price
Acting Superintendent
Monterey Bay
National Marine Sanctuary

Holly Price for

Maria Brown
Manager
Gulf of the Farallones
National Marine Sanctuary



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southwest Region
501 West Ocean Boulevard, Suite 4200
Long Beach, California 90802- 4213

47

DEC 15 2004

In Reply, Refer to:
151405SWR2004PR20146:MLD

Mr. Herrick Hanks, National Monument Manager
U.S. Department of the Interior
Bureau of Land Management
California Coastal National Monument
299 Foam Street
Monterey, California 93940

Dear Mr. Hanks:

This letter responds to your request for the National Marine Fisheries Service (NOAA Fisheries) to review the California Coastal National Monument (CCNM) Draft Resource Management Plan/Draft Environmental Impact Statement (RMP/EIR), dated August 2004. The Draft RMP/EIR details the range of alternatives for managing the approximately 20,000 rocks, small islands, exposed reefs, and pinnacles off the 1,100-mile length of the California Coast. Overall, the document focuses on the protection of the scenic and geological formations of the monument and the habitat they provide for marine mammals and other wildlife.

On October 28, 2004, Monica DeAngelis and Marty Golden of my staff, met with you to discuss the Draft RMP/EIR. During the October 28, 2004, meeting, provisions for research, education, and additional planning through collaboration with the Bureau of Land Management (BLM) and NOAA Fisheries were discussed. The Draft RMP/EIR indicates that BLM will develop policies, plan elements and cooperate with other agencies to protect wildlife, including several species of marine mammals and their associated habitat within the CCNM. As was discussed in the meeting on October 28, 2004, NOAA Fisheries would like to collaborate with BLM to protect marine mammals and their associated habitat as well as other wildlife under the jurisdiction of NOAA Fisheries within the CCNM. **47-A** The Final RMP/EIR should clarify what it is that BLM plans to have charge of and what is to be provided through partnerships with other entities. In addition, Mr. Golden will be providing detailed comments to you via an e-mail concerning this project and recreational fishing. **47-B**

NOAA Fisheries would like to express our appreciation for taking the time to meet and discuss collaboration. We look forward to partnering with you on this effort. If you have any questions, please contact Monica DeAngelis at (562) 980-3232.

Sincerely,

for Rodney R. McInnis
Regional Administrator

cc: Marty Golden, Pacific Recreational Fisheries Coordinator, NOAA-F/CS

2

NOAA Fisheries Recreational Fisheries Services Branch (F/CS)
Comments Regarding

BLM Draft Resource Management Plan (RMP)/Draft Environmental Impact Statement (EIS) for the California Coastal National Monument (CCNM)

General Comments:

1) The history of marine managed areas in the US has a checkered past as related to both recreational and commercial fisheries. In some cases verbal assurances about how things would be managed were made by government officials, only to be rescinded years later by reference to the "fine print" of a management document. This history provides the grounds for many of the comments below.

2) There are a number of places in the document that imply that the BLM may (now or in the future) regulate fishing in the vicinity of the Monument (CCNM) using access restrictions. Based on a meeting (October 28, 2004) with Mr. Rick Hanks, CCNM Manager, and Marty Golden and Monica DeAngelis, NOAA Fisheries staff, it was made clear that the BLM does not intend to restrict fishing. Therefore, it is recommended that any wording that implies limiting fishing in the CCNM area be removed from the document and any access restrictions to water areas be clarified. 47-C

To ensure that there is no misunderstanding regarding this, a number of specific comments have been made (below). CCNM resource protection involving water based activities should be addressed by working with the appropriate agencies that have jurisdiction over the resource in question. 47-D

3) The focus of the entire document regarding BLM activities related to the Monument should be on education and outreach, research, and interagency coordination and cooperation. Regulatory focus regarding fish and wildlife should be minimal. 47-E

4) General comments and comments specific to the Executive Summary should also be applied to other parts of this document, even, if there is no specific comment addressing a particular matter. 47-F

5) The abbreviation for the California Department of Fish and Game is often "CDFG" vs "DFG" – suggest checking with CDFG to determine their preference. 47-G

6) Regarding Appendix B, Scoping Report. Even though entire document is available on the web, at a minimum, some information (summary) should be included here. 47-H

Specific Comments:

1) Page ES2, Para 2 – at end of sentence add "(Appendix D)" 47-I

Page 1 of 4

2) Page ES6, Para 2, Section ES4.6 – After sentence #4 add the following sentence: "Additionally, the Plan will not authorize the BLM to make regulations that would restrict fishing from the waters of the Monument, but would foster interagency coordination to address specific resource management concerns." 47-J

3) Page ES7, Para 2, Section ES4.10 – After the last sentence add the following: "Land acquired by the Monument after the adoption of this Plan, would not be subject to additional restrictions that are not provided for in this Plan." 47-K

4) Page ES10, Para 3 – Considering the importance of research, BLM should consider some sort of research plan. As the document is written there are no details regarding BLM funded research. 47-L

5) Page ES10, Para 5, last sentence – Reword in part as follows .... developed by CDFG through its Marine Life Protection Act planning process and other agencies with relevant jurisdiction. 47-M

6) Page ES12, Top banner and Paras 2 and/or 3 – The US Fish and Wildlife Service and the National Marine Fisheries Service (NOAA Fisheries) should be included specifically (and named in this document) as Collaborative Partners in this section. 47-N

[For appropriate context the following 3 comments should be considered together]

7) Page ES13, Top banner, Re Alternative A – Reword in part follows: .... support for low-impact recreation (including water based sportfishing), and the need for future research.

8) Page ES13, Re Alternative A, bullet #2 – Delete ("appreciate from afar")

9) Page ES13, Re Alternative A, 1st sentence below bullets – Reword in part follows: .... resource protection, low-impact recreation (including water based sportfishing), and the need for future research ... 47-O

10) Page ES13, Re preferred alternative. Presently, this draft indicates that Alternative A is the preferred alternative. The choice of alternatives should be predicated upon minimizing restrictions for public access while providing reasonable resource protection. Page 3.3-5, para. #2, sentence #1, and other parts of section 3.3.2.2 observe that few places in the Monument are visited by the public. Therefore, is would be most cost effective and least intrusive to focus on areas that have the potential for significant impact from visitors. **To this end, Alternative C would appear to be the most appropriate alternative of those proposed.** 47-P

11) Page ES14, , Re Alternative C, bullet #1 – Reword in part follows: .... guided tours, kayaking, sportfishing) 47-Q

Page 2 of 4

12) Page ES14, Re Alternative C, 1st Para below bullets, last sentence: Suggest deleting phrase "known and suspected" [keeps sentence simple and clear] **47-R**

13) Page 1-8, 4th bullet – As worded this is problematic as it suggests a potential impact to recreational fishing. Suggest deleting the second sentence of bullet entirely. **47-S**

14) Page 1-11 & 1-12, Section 1.6.3 – Suggest all NOAA agencies be clumped together as sub headings under National Oceanic and Atmospheric Administration (NOAA), same for DOI & DOD. Also based on recent collaboration, NOAA Fisheries could be included in the 1st set of bullets. **47-T**

15) Page 1-13, Section 1.9, Para 2 – Suggest including something about the public process for dealing with future plan revisions. **47-U**

16) Page 2-4, 1st Para in "Partnerships" section – Reword in part follows: .... NOAA (which has oversight for Federal Fisheries, MMPA, and ESA, as well as the management of four offshore marine sanctuaries); **47-V**

17) Page 2-5, last Para – Some revisions are in order here to reflect additional collaborative activities (i.e. NOAA Fisheries) since the draft was published. **47-W**

18) Page 2-6, last Para – Since you have a section (Para) on Core Partners, should there also be one here for Collaborative Partners and Stewards? **47-X**

19) Page 2-10, Research Permitting… section, Para 2 – Research permits for marine mammals and endangered species are required from the USFWS and/or NOAA Fisheries. This should be reflected this para. Also when proposing any such research both of these agencies should be involved. **47-Y**

20) Page 2-13, Re Alternative A, bullet #2 – Delete ("appreciate from afar")

21) Page 2-13, Re Alternative A, 1st sentence below bullets – Reword in part follows: .... resource protection, low-impact recreation (including water based sportfishing), and the need for future research … **47-Z**

22) Page 2-14, , Re Alternative C, Section 2.3.4 - bullet #1 – Reword in part follows: .... guided tours, kayaking, sportfishing).

23) Page 2-14, Re Alternative C, Section 2.3.4, Para below bullets, last sentence – Suggest deleting phrase "known and suspected" [keeps sentence simple and clear] **47-AA**

24) Page 2-15, Enforcement Section, Para 1, 2nd sentence – NOAA Fisheries presently has enforcement officers that cover the entire marine environment in California, related to authority under the ESA, MMPA, and some fisheries issues. Thus may want to add NOAA Fisheries enforcement officers after "DOI special agents". **47-BB**

25) Page 2-28, "Recreation" section, 1st Para – At the end of the paragraph add the following sentence: "Additionally, the Plan will not authorize the BLM to make regulations that would restrict fishing from the waters of the Monument, but would foster interagency coordination to address specific resource management concerns."

26) Page 2-28, next to last Para., lines 4 & 5 – Suggest deleting phrase "to a lesser extent from the ocean," **47-CC**

27) Page 2-28, "Plan Decisions" section, line 2 – Suggest adding "sportfishing" after word "swimming". **47-DD**

28) Page 2-48, 3rd line from bottom of page – After "ESA" add "and MMPA" **47-EE**

29) Page 4.3.2, Section 4.3.2.2 – Suggest providing some additional detail as to what BLM sensitive species and CNHP-rare species are. **47-FF**

30) Page 4.3.6, Section 4.3.7.7, Para 2 – Suggest some minor editorial changes in part as follows:

Line 1 – … and marine mammals may cause …
Line 3 – … when approached too closely. …
Line 4 – … islands may be disturbed and/or abandon nests …. frequently bothered. **47-GG**

31) Page 4.3.8, 1st two lines. – It is likely for Alternative C that "Moderate beneficial effects to wildlife resources from recreational management actions and education/outreach programs may be expected". Thus this sentence should be added to the conclusion for Alternative C. **47-HH**

32) Page 8-1, Glossary – Should be more comprehensive with respect to acronyms. **47-II**

File: Admin/BLM CCNMcommentsMFG04B.doc Rev. 12/10/04

DEPARTMENT OF THE NAVY
COMMANDER NAVY REGION SOUTHWEST
937 NO. HARBOR DR.
SAN DIEGO, CA 92132-0058

(48)

IN REPLY REFER TO:

5090
Ser N45PA/264
December 15, 2004

Mr. Herrick E. Hanks
Monument Manager
Bureau of Land Management
299 Foam Street
Monterey, California 93940

RE: 1610.4-7(P) CA-939 – Comments on the Draft Resource Management Plan (RMP)/Draft Environmental Impact Statement (EIS) for the California Coastal National Monument

Dear Mr. Hanks:

Thank you for the opportunity to comment on the Draft Resource Management Plan (RMP)/Draft Environmental Impact Statement (EIS) (Draft) for the California Coastal National Monument (CCNM). Rear Admiral Betancourt is the Department of Defense (DoD) Regional Environmental Coordinator for Region IX, who coordinates environmental issues among all the military services in California. On behalf of Rear Admiral Betancourt and the military services in California, I offer the following comments regarding the Draft RMP/EIS.

DoD fully supports the intent of the January 11, 2000, Presidential Proclamation (Proclamation) establishing the CCNM along California's mainland coastline. As the Proclamation asserts, the rocks, pinnacles, and land formations off the California coast are geological treasures and merit preservation. Let me assure you that as one of the primary landowners on the coastline, DoD takes its responsibility to protect resources in areas under its control seriously and will continue to do so. DoD fully recognizes the value of being a good environmental steward.

DoD environmental policy provides, "It is DoD policy to display environmental security leadership within DoD activities worldwide and support the national defense mission by: …7. Conserving, and restoring where necessary, the natural and cultural heritage represented on DoD installations within the United States."[1] DoD lands and the coastal waters adjacent to them are among the most pristine in California and host a diverse assortment of species. Endangered colonies of least terns and snowy plovers at Vandenberg Air Force Base, Naval Base Coronado, and Camp Pendleton, the thousands of elephant seals at San Nicolas Island, and the white abalone are but a few examples of the outstanding natural resource values found on and near DoD facilities along the coastline. Such resources have been the focus of a wide range of management efforts, which is a testament to the DoD's commitment to natural resources conservation and preservation.

DoD would like to compliment you on the Draft RMP/EIS. It is extremely well written. DoD does, however, have some concerns with the Draft RMP/EIS that I would like to bring to your attention. Briefly, the issues of most concern to DoD are:

48-A

1. Whether the rocks and pinnacles, etc. adjacent to islands more than 12 miles from the California mainland coastline are included in the CCNM. It is DoD's position that these land formations do not fall within the scope of the CCNM and that the Draft RMP/EIS should be edited to clarify this point. The January 11, 2000, Proclamation establishing the monument uses the 840-mile coastline, which is the direct line measurement of the mainline California coast from Oregon to Mexico. According to the Proclamation, the unreserved rocks and small islands within 12 miles of the 840-mile coastline (i.e., the mainland California coastline) are to comprise the CCNM. San Clemente Island, San Nicolas Island, San Miguel Island, and the rocks and pinnacles immediately adjacent to these islands are more than 12 miles from the mainland coastline, and therefore, outside CCNM. Further, the CCNM map dated the same date as the Proclamation and available on BLM's CCNM website correctly excludes the above islands and associated rocks from the CCNM.[2]

48-B

2. Whether the Draft RMP/EIS adequately addresses the impact of the CCNM on the military. It is DoD's position that the Draft RMP/EIS does not adequately address military activities within the CCNM and that additional language is needed to correct this deficiency. It is essential that implementation of the RMP be consistent with existing and future military uses of the lands and interests in lands that have been specifically reserved for military purposes, as well as the military's use of the California coastline in general. For example, there are three low-level Military Training Routes (MTRs) (VR1250, VR1251, and VR1260) in northern California that overfly CCNM rocks. The Strike Fighter Wing at Lemoore controls these MTRs and each has a 200 foot AGL floor. The Draft RMP/EIS does not specify how BLM's management of the CCNM will accommodate these overflights. Furthermore, the implementation of the RMP as currently set forth in the Draft is inconsistent with the existing military uses on and around San Clemente Island and San Nicolas Island, especially with respect to the planned recreational uses of the CCNM.[3] Every deploying Pacific Fleet Carrier Strike Group and Expeditionary Strike Group uses the ranges on and around San Clemente Island to train prior to deployment and to sustain their readiness levels in support of the Global War on Terrorism. DoD needs to ensure its ability to train for this and future missions. The same is true with regard to planned recreational uses as outlined in the Draft RMP and Vandenburg Air Force Base launch activities.

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[1] DoD Directive 4715.1

[2] January 11, 2000, map of the CCNM (www.ca.blm.gov/pa/coastal_monument/map.html).

[3] For example, the next paragraph explains the various zones that are established around San Clemente Island. These zones are specifically established to keep individuals out of these areas.

5090
Ser N45PA/264
December 15, 2004

Please note that the military's uses of its land, air, and water ranges are officially authorized. San Clemente, San Nicolas, and San Miguel islands were reserved for military purposes.[4] Additionally, the areas around these islands have been identified for military uses. The FAA, for example, designates the use of air space and the U.S. Coast Guard has published regulations identifying Security Zones, Danger Zones and Restricted areas based on military uses.[5] Per the Draft RMP/EIS, BLM does not propose to impact the existing rights of others by managing the CCNM. This intent, especially pertaining to the military's test, training, and operational activities, needs to be clearly stated. 48-B

3. Whether BLM's statements in the Draft RMP/EIS as to its jurisdiction with regard to the CCNM is overbroad, especially as set forth in the Executive Summary and Introduction chapters. DoD believes that BLM's jurisdictional statements are overbroad and recognizes that this may not be intended. To avoid confusion and future misinterpretation, it is imperative that the BLM be more precise and technically accurate when referring to both BLM's management jurisdiction of the CCNM and the authorities that other agencies have pertaining to associated resources. 48-C

As you can see, DoD has some significant concerns with regard to the Draft RMP/EIS for the CCNM. In addition to the general comments stated above, the attachment contains comments from the Navy and the Marine Corps on the specific language and content of the Draft RMP/EIS. It is my understanding that the Air Force has forwarded comments to you on the Draft RMP/EIS in its role as a cooperating agency. In order to address these concerns, DoD requests that BLM: (1) recognize that the rocks and pinnacles, etc. associated with San Clemente, San Nicolas and San Miguel Islands are not part of the CCNM, in keeping with the original extent of the CCNM and (2) include language that exempts DoD from any restriction to DoD carrying out its mission around and near the CCNM. 48-D

Thank you again for the opportunity to comment. DoD looks forward to working with you to resolve the above concerns. It is our hope that DoD's comments help the BLM to prepare a high-quality final RMP and EIS.

Sincerely,

A. J. GONZALES
Captain, U.S. Navy
Program Director Environment

Enclosure: 1. Comment Matrix

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[4] Executive Orders 6009, 6896, and 6897.

[5] 33 CFR 110.218, 165.1131, 165.1191, 334.920, 334.921, 334.950, 334.960, and 334.961.

3

Department of the Defense (DoD)
Comments on the Draft BLM CCNM EIS/RMP
December 2004

#	Page	Line/Para/Sec	Comment	
1.	ES-2	P 1, L 10	How the BLM arrived at an estimate of more than 20,000 rock and small islands needs to be explained. The BLM's earlier fact sheet on the CCNM estimated "over 11,500 rocks, islands, exposed reefs, and pinnacles." The BLM's estimate in the Draft EIS/RMP almost doubles the figure used in the fact sheet.	48-E
2.	ES-2	P 1, L 11	When referring to the CCNM Presidential Proclamation, it is inaccurate and misleading to use the 1,100-mile California coastline. The Proclamation clearly states that it is using the 840-mile coastline, which is a line from Oregon to Mexico that follows the main coastline of California, as stated on ES-11. DoD recommends that the BLM use the 840-mile coastline measure when referring to what the CCNM proclamation says. BLM does not have the authority to expand its jurisdiction beyond that given in the Presidential Proclamation.	48-F
3.	ES-3		Prior to the last paragraph in Section ES.2, the BLM needs to identify (1) what its jurisdiction is and what it is not and (2) what is not included within the CCNM. The DoD recommends the following language be inserted: "Islands such as San Clemente and San Nicolas, over which the Navy has been given control and jurisdiction by Executive Order, that are beyond the 12-mile limit of the CCNM are not within the CCNM. Additionally, the BLM recognizes the authority of other agencies (e.g., the FAA, DoD, Army Corps of Engineers) to designate and regulate portions of the water, below-high-mean-tide lands, and the air surrounding the CCNM rocks and islands for particular purposes and uses (e.g., danger safety zones and low-fly zones). The management of the CCNM will not impinge on the designation of these areas or the uses/restrictions that such designations provide for." DoD's requested language is consistent with the BLM's own map of the CCNM, which does not include the rocks around San Clemente, San Nicolas, or San Miguel islands. The map can be found at www.ca.blm.gov/pa/coastal_monument/map.html.	48-G
4.	ES-3	P 4, S 4	Revise the beginning of the 4th sentence to read "The RMP does not supersede or modify current uses of the adjacent lands, water, or air ...." As written, one could interpret the sentence to say that, although it is not intended to do so, the RMP can supersede or materially modify current and future uses of ...."	48-H
5.	ES-5	ES.4.3. S 5	At the end of the sentence, it reads "as BLM jurisdiction does not extend to the ocean and land surrounding the coastal rocks and islands." This is an incomplete statement of BLM's jurisdiction pertaining to the CCNM. BLM's jurisdiction does not extend to the air space above the rocks, nor does it extend to the animals/mammals on the rocks. BLM's jurisdiction is over the land mass only.	48-I
6.	ES-6	ES.4.6.	The entire recreation paragraph is inconsistent with the military's use of its adjacent lands. If the rocks around SCI and SNI are not excluded from the CCNM, then the desire to An increase in recreation activity around the rocks adjacent to SCI and SNI is inconsistent with the use of these islands for naval purposes, as provided for in the Executive Orders giving jurisdiction of these lands to the Department of the Navy. Additionally, the Navy has established danger zones and security zones. Encouraging recreation in these areas is contradictory and in violation of	48-J

Page 1 of 9

#	Page	Line/Para/Sec	Comment	
			existing regulations where the intent is to keep individuals safe and out of the areas surrounding the islands.	
7.	ES-7	P 1	Note, consistent with the DoD's position that the San Clemente and San Nicolas islands are not part of the CCNM, these islands and nearby rocks have not been part of the BLM's ACEC in the past.	48-K
8.	ES-7	Sec. ES.4.11	For clarity, insert the words "of the CCNM rocks and islands" between the words "uses" and "would be authorized only if " so the sentence reads "Under the proposed RMP, additional uses of the CCNM rocks and islands would be authorized only if they do not conflict with the protection of the monument resources."	48-L
9.	ES-8	Mission Statement	The mission statement for the CCNM should track with the Presidential Proclamation. As written, it does not. It appears that the mission statement on ES-8 is that of the joint management entity rather than the CCNM itself. Recommend rewriting for clarity and accuracy. Additionally, the mission statement here is too broad (i.e., "in and around the CCNM";). BLM's jurisdiction stops at the rocks/islands that are part of the CCNM.	48-M
10.	ES-11	P 1, L 5	"1,100 miles" should be "840 miles."	48-N
11.	ES-11	P 2, L 6	Include the Manley et al. 1995 reference in the reference section of the document.	48-O
12.	ES-12	Description of Action Alternatives	The Description of Action Alternatives in the Executive Summary does not accurately characterize the Action Alternatives described in Chapter 2. For example, according to the executive summary, Alternative A provides for "low-impact recreation" and Alternative C "promotes a greater variety of active recreation on and adjacent to the CCNM." In fact, no recreation will be permitted on any monument rock or island under any of the alternatives. The differences in recreational uses among the alternative relate to how much and what kinds of recreational activities the BLM and its partners will promote or support near the monument rocks and islands. DoD recommends revising the summary of the Action Alternatives to more accurately reflect what is described in subsequent document chapters. Additionally, to avoid confusion, the BLM needs to state that its alternatives apply only to the islands and rocks of the monument where it has jurisdiction and not to, for example, the waters surrounding the rocks.	48-P
13.	1-i	P 1, L 3, L 4	"1,100" should be "840." "20,000" should be "11,500."	48-Q
14.	1-1	Sec. 1.1	Although the DoD has assurances that the BLM and its CCNM partners do not intend to adversely impact or encroach upon military training or research and development activities adjacent to the CCNM, the DoD is concerned that those assurances may erode over time as new people and organizations become involved in the management of the CCNM. For this reason, the DoD requests that the BLM insert the following paragraph into the plan. "Not withstanding existing laws and regulations, nothing in this plan expressly or implicitly precludes, restricts or requires modification of current or future uses of the lands, waters, or airspace adjacent to the California Coastal National Monument by the Department of Defense, its agents, allies, military range and test facility base users or range service providers." Given the RMP/EIS organization, an appropriate place would be at the end of Section 1.1, which introduces the purpose and need for the plan.	48-R
15.	1-1	Sec. 1.2.1	See Comment 7 above. (The mission statement for the CCNM should track with the Presidential Proclamation. As written, it does not. It	48-S

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#	Page	Line/Para/Sec	Comment	
			appears that the mission statement on ES-8 is more correctly that of the joint management entity that the BLM is working with, not the CCNM itself. Recommend rewriting for clarity and accuracy.)	
16.	1-3	Figure 1-1a	As worded, the legend is misleading. Instead of "Lands Within the CCNM," the DoD recommends the less-confusing label "The CCNM." Another alternative would be to put the waters (Mean high tide and Mean low tide) in the legend and label them "Lands and Waters Not In the CCNM."	48-T
17.	1-4	Figure 1-1b	Revise the Figure 1-1b to show the 12-nautical mile boundary only extending seaward from California's mainland coast, which more closely approximates the 840-mile long coastline referenced in the Proclamation.	48-U
18.	1-5	P 6, L 1 - 2	Based on the Proclamation and the BLM's planning criteria, the primary focus of the RMP is not the protection of the biological resources. The primary focus of the RMP should be on the protection of the geological features (which are the monument) so that those features can continue to provide a productive and safe habitats for the animals and plants that use them.	48-V
19.	1-6	P 4	The BLM's answer to the question "How will people's activities and uses along the coast be affected by management of the CCNM?" is incomplete and confusing. The DoD recommends substituting the following language. "The Presidential Proclamation establishing the CCNM gives BLM the authority to protect the rocks, small islands, exposed reefs, and pinnacles above mean high tide. This means that people's activities and uses that physically disturb these geological features or that appropriate, injure, destroy, or remove any feature of the monument will not be allowed. The BLM's jurisdiction, however, only extends to where its rocks, small islands, exposed reefs, and pinnacles meet the water when the tide is at high mean tide. Where activities in nearby waters and on adjacent lands are harming CCNM's resources, the BLM will consult with the appropriate entities (e.g., private property owners, state regulatory agencies, local governments, other federal agencies) to develop and implement practices that protect the CCNM, while providing for the entities' right to use their land or to conduct the activities."	48-W
20.	1-7	1.4.2	Delete "Navy" in the last bullet. Navy is not the only entity that uses sonar.	48-X
21.	1-7, 1-8	Sec. 1.5.1	The planning criteria outlined in this section are very clear and specific about what constitutes the monument, the BLM's jurisdiction, the purpose and content of the plan, and the relationship of the plan to other governmental plans. Incorporating the planning criteria into the executive summary would significantly enhance the executive summary.	48-Y
22.	1-8	1.5.1	Insert a bulleted planning criteria that states "The RMP will be consistent with the operations of the Department of Defense on land, water, and airspace adjacent to the CCNM."	48-Z
23.	Chapter 2	General	In addition to the Navy questioning inclusion of the rocks off of San Clemente Island and San Nicolas Island in the CCNM based on distance from California's main coastline, the Navy believes that all of the RMP's alternatives, except the No Action alternative, are incompatible with the DoD's ongoing uses of these two islands. The statement "San Clemente Island (SCI) is the cornerstone of the tactical training range complex supporting the Southern California Operations Area (SOCAL), which supports the largest concentration of naval forces in the world." is	48-AA

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			not an exaggeration. Executive Order 6897 (November 7, 1934), transferred San Clemente Island and the rocky island at the west entrance to Northwest Harbor to the Navy. The Navy's operating ranges, including those around San Clemente, are established and authorized by a variety of Federal entities. The FAA, for example, codifies the air ranges, the Corps of Engineers issues the Danger Zones and Restricted Area regulations, and the U.S. Coast Guard issues Security Zones. The Proclamation establishing the CCNM and the RMP/EIS make it clear that the BLM's management of the CCNM will not affect existing rights of use. The DoD maintains that implementation of Alternatives A, B, or C, all of which call for increased management of rocks within the CCNM, will infringe upon the military's right to use its designated ranges, operating areas and routes for training and research and development that is essential if the DoD is to achieve its mission. In order to meet BLM's stated intention (on page ES-3) to not impact rights of use (both current and future), the RMP/EIS must include language that permits the military to continue to operate/train. Please note that the DoD has been actively addressing the management of the rocks around San Clemente Island and San Nicolas Island for many years. In fact, the Navy addressed the management of natural resources on San Clemente Island and in the 300 yard zone around the island in its Integrated Natural Resources Management Plan (May 2002). The Fish and Wildlife Service concurred with the management strategies outline in the plan. The rocks around San Clemente Island that the BLM identifies as being in the CCNM are within the 300 yard zone. As written, without additional language permitting the military to continue to train/operate, only under the No Action Alternative will the natural resources management continue without encroaching on the DoD's ability to train its warfighters.	48-AA
24.	2-3	P 3	Inclusion of an example activity plan as an appendix would enhance the RMP. What requirements does the BLM have to ensure that these activity plans are developed with full public participation?	48-BB
25.	2-3	P 4	As written, the reader could interpret the monument boundaries to border the area in which the monument features are located rather than being the monument features themselves. The DoD recommends recalculating the aerial extent of the CCNM based on the 12-nautical miles from the mainland coast and revise the second sentence to read as follows: "The CCNM is scattered throughout an area of more than _______ square nautical miles. The northern most rocks are near the Oregon border and the southern most rocks are not far west of downtown San Diego. The vast majority of the monument's features are within sight of California's mainland, although they can be up to 12-nautical miles from the coast."	48-CC
26.	2-3	P 5, L 6	Add the P. N. Manley et al. 1995 reference to the reference section.	48-DD
27.		Table 2-1	Please make clear in a footnote that DoD enforcement would not involve the use of active troops, or better yet, delete the "X" under Enforcement to prevent confusion and concern that the DoD might be violating the legal tenants of posse commitatus. Also, please delete the "X" under land acquisition and add an "X" under research. The DoD, especially	48-EE

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			the Navy, conducts research on many land and sea animals and plants that the BLM would find useful in its efforts to manage the CCNM.	
28.		Figure 2-2c	Delete Sub-Units 34 and 35. They should not be part of the CCNM as the islands are more than 12 NM from California's mainland coast, which is the basis for the 840 mile coast in the Presidential Proclamation.	48-FF
29.		Table 2-2	Delete Sub-Units 34 and 35. They should not be part of the CCNM. These islands are more than 12 NM from California's mainland coast, which is the basis for the 840 mile coast in the Presidential Proclamation.	48-GG
30.	2-10	P 5, L – 2	The BLM's statement that it plans to assume an active role in coordinating "research along the entire California coast" seems to overreach its CCNM management responsibilities. Additionally, with the current and projected increased in operations on Navy training ranges and operational areas (subject of current DoN NEPA documentation), additional restrictions on range utilization (set aside for biological study) would encroach upon the DoD's access to critical training areas and ranges, and RDT&E areas.	48-HH
31.		Table 2-3	DoD suggests changing the title to "Organizations Conducting Research Along the California Coast." All the organizations listed (e.g., U.S. Fish and Wildlife Service) are not research institutions. In addition, please add the U.S. Navy and the Air Force to the list of government agencies conducting research.	48-II
32.	2-13		In keeping with the CCNM proclamation and the BLM's management jurisdiction, the first goal of all the alternatives should be physical protection of the rocks, not the protection of seabirds and marine mammals.	48-JJ
33.	2-15	P 4	This paragraph does not mention DOD being responsible for enforcement. This is correct, but is contradictory to Table 2-1, where DOD is identified as having law enforcement responsibilities.	48-KK
34.	2-18	P 1	The discussion about the ACEC designation is confusing. The DoD was never aware that the BLM had designated an ACEC that fell within its Pacific Ocean training ranges. Based on statements made at the San Diego public meeting, it appears there are no documents that spell out what is in or out of the California Islands Wildlife Sanctuary ACEC or that define the ACEC's precise boundaries. If this is the case, then the DoD believes the BLM should rewrite the ACEC designation language so that it does not say or imply that the new proposed California Coastal ACEC is simply a continuation of a former wildlife sanctuary ACEC.	48-LL
35.	2-20	Last paragraph	The first sentence dealing with Consultation with Tribes is technically incorrect. The BLM, or any other Federal agency, would not engage in government-to-government consultation with the Native American Heritage Commission or any "interested" tribe. It could engage in government-to-government consultation with the Federally-recognized tribes.	48-MM
36.	2-21	P 4, L 4	Note that formal NRHP eligibility determinations are rendered by the Keeper of the National Register, National Park Service. The BLM and the SHPO, in consultation, arrive at consensus determinations of eligibility.	48-NN
37.	2-21	P 6, L 2	As written, the requirement is too burdensome. In the vast majority of situations all work or activities do not need to stop, only ground-disturbing activities.	48-OO
38.	2-21	P 8	The paragraph needs to make clear that remnants of shipwrecks may be	48-PP

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			on the monument, but shipwrecks are not on the monument.	
39.	2-24	P 2, Table 2-6	"Activities that should be closely managed during seasonal restrictions would include all activities with the potential to disturb wildlife. These activities include, but are not restricted to, scuba diving and snorkeling, seaweed collecting, boat traffic (including kayaking), overflights by airplanes, rock climbing, and onshore activities (e.g., fireworks displays) near sensitive sites. Restrictions would be implemented seasonally, based on known nesting and pupping seasons for marine birds and mammals." This and other similar statements in the Draft RMP/EIS are problematic. The DoD recommends deleting the entire paragraph and Table 2-6, which has no import because under Alternatives A, B, and C no one is going to be allowed to recreate on the monument rocks during any time of the year.	48-QQ
40.	2-27	P 3, L 3	Revise the phrase "in the CCNM" to read "on the CCNM."	48-RR
41.	2-28	2nd to last paragraph, L 1	Delete the phrase "or adjacent to." The BLM has no jurisdiction off the monument.	48-SS
42.	2-29	Plan Decision bullets	The BLM has no jurisdiction to "permit" wildlife viewing, photography and painting, water sports (including swimming, kayaking, and sailing) from the mainland or from the adjacent waters. By definition, they are not occurring on the monument.	48-TT
43.	2-36		The RMP includes an extensive description outlining Research Monitoring/Permit Procedures for CCNM resources. In addition, it establishes BLM as the authorizing agent for approving projects and access to CCNM resources to non-DoD personnel for the purpose of Research Monitoring/Evaluation activities. Establishing BLM as the approval authority for projects in areas that fall within military training operational areas would be incompatible with the DoD mission for these areas (SCI and SNI).	48-UU
44.	2-42		Alternative B proposes to ban all surface-disturbing activity with the potential to adversely affect physical resources (except foot traffic). This restriction has the potential to negatively impact training activities around SCI, and therefore, would be incompatible with the military mission.	48-VV
45.	2-57	P 7, L 1	According to the Draft, the RMP will be evaluated at least once every 4 years. Please explain how this fits with the statement that the RMP is intended to be a 10 – 20 plan.	48-WW
46.	2-59	P 2	According to section 2.4.7, Alternatives Considered But Not Analyzed in Detail, the option of "No New Regulations" was ruled out. Statements made at the San Diego public meeting, however, indicated that no new regulations would be proposed. Additionally, pages ES-3 and 2-59 state that BLM will not be establishing any new regulations.	48-XX
47.	2-59	P 8	The DoD requests that the BLM revise the paragraph to read: "**Regulate the Navy's Use of Sonar in the Coastal Area.** BLM does not have jurisdiction to regulate activities off the monument."	48-YY
48.	3.1-1	P 4	Campo, Manzanita, and La Posta are separate reservations, not one as written. Also, there are many other reservations in San Diego County that are not on the list. Why? Please correct errors or explain why these particular reservations are called out.	48-ZZ
49.	3.3-6	P 4	The DoD recommends inserting a sentence that clarifies that the BLM and the RMP/EIS can not impose any restrictions on low-flying aircraft. Additionally, BLM has no authority to protect the nesting seabirds or marine mammals. Other regulatory agencies have this authority.	48-AAA
50.	3.4-1	P 4	The first sentence is technically incorrect. A historic property is any	48-BBB

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			prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register. In addition, a Federal agency and SHPO may arrive at a consensus determination of eligibility for a property, and that determination is generally accepted for a Section 106 action. Nevertheless, for a property to be officially determined eligible, the Keeper of the National Register (NPS) makes the determination, usually with input from the SHPO and generally from the Federal agency.	48-BBB
51.	3.8-1	P 4	The list of tribes appears to be incorrect. See above comment.	48-CCC
52.	Table 3.9-1	3 of 5	1. Table should include Begg Rock, which the Navy owns. 2. Table should include Richardson Rock, which Navy owns. 3. For San Clemente Island management: Delete "NOSC" and insert "Naval Base Coronado." 4. For San Nicolas Island management: Delete "Pacific Missile Range" and insert "Naval Base Ventura County."	48-DDD
53.	3.15-1	P 2	As written, the paragraph is misleading. Please clarify, so that the reader understands that only the recreational activities that touch the rocks would be under the BLM's management. For example, fishing, snorkling, sailing, aerial sightseeing, by definition, are not on the monument. Using the rocks to launch boats or as staging areas for underwater activities, however, could affect the monument. The language in Section 4.15, which deals with Recreation and Environmental Consequences, is accurate and unambiguous regarding the BLM's jurisdiction over recreational activities. The DoD recommends using similar language in this report section.	48-EEE
54.	3.15-4		The second paragraph of the Coastal Access discussion (section 3.15.2.2) ends in mid-sentence.	48-FFF
55.	3.16-1	P 3, L 6	Add DoD to the list of agencies that issue permits for conducting research on its lands. (example: ARPA permits).	48-GGG
56.	3.16-2	Table 3.16-1	See comment 28 above. Tables 2-3 and 3.16-1 need to be revised. They have the same title but not all institutions listed on 3.16-1 are on 2-3. The U.S. Navy should be added to both lists as a federal agency that conducts research along California's coast.	48-HHH
57.	3.21-2	P 5	The paragraph needs clarification. One can interpret the paragraph to say that the BLM is proposing to lift the ACEC designation, which is not the case.	48-III
58.	4.0-1	4.0.2	Terminology for effects uses incorrect statutory language regarding mitigation. NEPA does not have a trigger for mitigation. NEPA merely requires environmental impacts be identified and analyzed. An agency may choose to mitigate in order to achieve a Finding of No Significant Impact. Other statutes have triggers for mitigation (i.e., ESA).	48-JJJ
59.	4.3-6	P 7, L 5-6	The DoD recommends adding the following sentence after the sentence that says the BLM will encourage seasonal restrictions on aerial access and coordinate with the FAA to enforce them. "Such restrictions would not apply to military training and research and development activities."	48-KKK
60.	4.4-3-4		Designation of the entire monument as a Cultural Resources Management Zone is not warranted based on what is already known about the monument's cultural resources. Such a designation should not be used to achieve protection of non-cultural resources, which is what BLM seems to be proposing in the Draft RMP/EIS.	48-LLL
61.	4.7-1	Section 4.7	In Health and Safety, Section 4.7, the BLM should address safety issues associated with the BLM's proposed management of monument rocks	48-MMM

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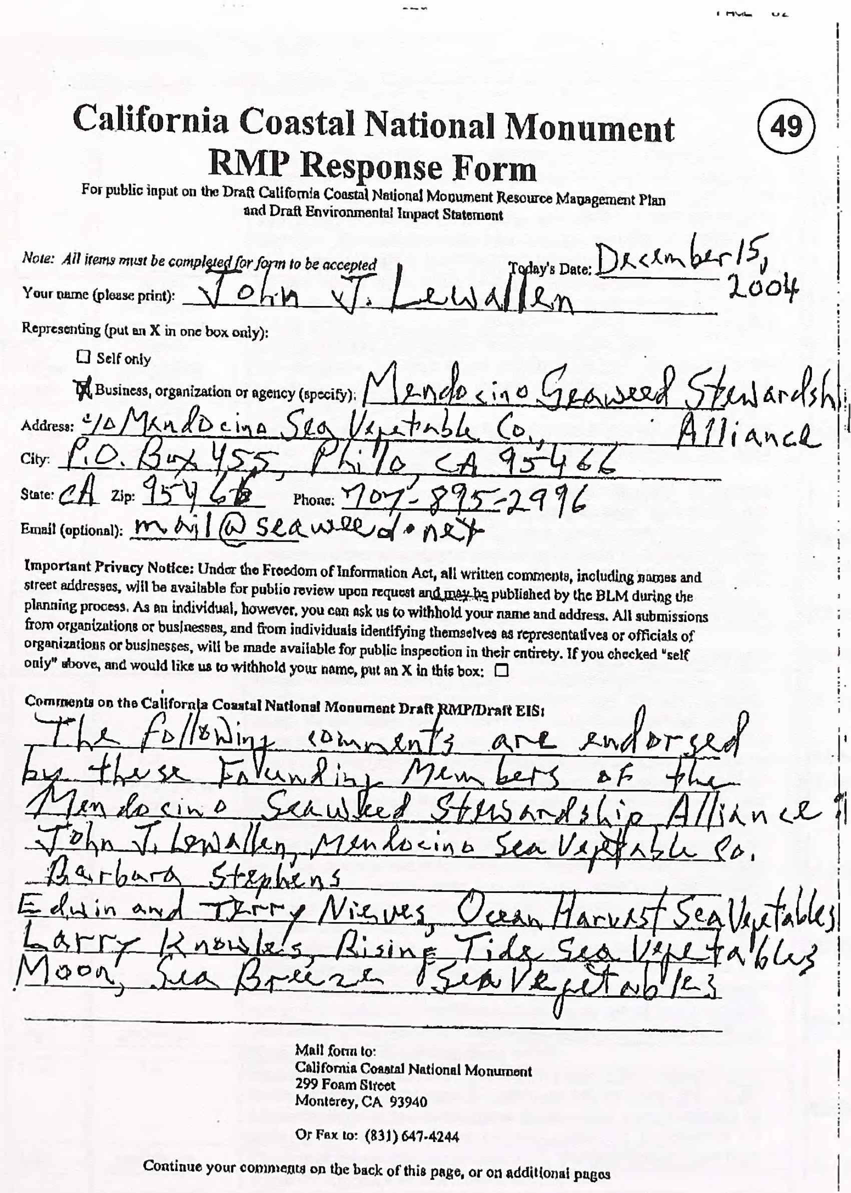
			within the military's various training and test ranges.	
62.	4.8-1	Section 4.8	As written, the discussion of Indian Trust Resources implies that there are such resources, and there are not. The DoD recommends (1) revising Section 4.8.1 to read "There are no Indian Trust Resources on or surrounding the monument. Thus, no actions under any of the Alternatives can have an adverse effect on Indian Trust Resources." and (2) deleting the remaining text in the section.	48-NNN
63.	4.9-1	Section 4.9	Section 4.9, Land Use/Lands and Realty, fails to address the impact of the BLM's proposed management strategies on the DoD's unfettered use of its sea, air, and land ranges, operating areas, and training routes. If the BLM's management of the CCNM will have no impact, then this should be clearly stated. As indicated in earlier comments, the DoD believes implementation of the draft RMP/EIS will have an impact on the military's continued use of its land, operating areas and training routes. Request BLM include language clearly stating the management of the CCNM will not impact military training, operations, testing, and evaluation. Absent this language, BLM is required to discuss the impacts on the military in this section	48-OOO
64.	4.15-4	Section 4.15.3.5, P 2, P 3	The second paragraph stating that "Recreation activities that occur near the monument would not be restricted by seasonal restrictions, and so would not be affected." is contracted by the next sentence (1st sentence of paragraph 3) "Under Alternatives A and B, seasonal use restrictions would be designated around rocks and islands with known sensitive populations of seabirds, marine mammals, and intertidal species." Revise sentence to reflect the BLM's actual jurisdiction.	48-PPP
65.	4.15-1-8-	Section 4.15	Section 4.15 Recreation is well-written, and the BLM's jurisdiction over recreational activities is clearly stated and unambiguous.	48-QQQ
66.	4.21-1	P 4, L4	The sentence "There would be no effects." is not necessarily true. The DoD recommends deleting the sentence.	48-RRR
67.	5-5	5-5.1.1	Details within the draft EIS on the scoping meetings are sketchy. The Document refers to the Public Scoping Report, which is another link and very long. The Scoping Report provides valuable insight and describes the process along with the comments from the public. Recommend that more information on the Public Scoping process and results be included at the beginning of Chapter 5.	48-SSS
68.	Map Atlas	Sub-Unit 34 San Clemente Island	Delete Sub-Unit 34 map showing San Clemente Island. The DoD contends that the rocks around San Clemente Island are not part of the CCNM.	48-TTT
69.	Map Atlas	Sub-Unit 35 San Miguel Island	Do not indicate that the rocks around San Miguel, over which the Navy has jurisdiction, are part of the CCNM. The DoD contends that the rocks around San Miguel Island are not part of the CCNM.	48-UUU
70.	Map Atlas	Sub-Unit 34 San Nicolas Island	Delete the Sub-Unit 34 map showing San Nicolas Island. The DoD contends that the rocks around San Nicolas Island are not part of the CCNM. [Note: The map does not show all the rocks around the island.]	48-VVV
71.	E-5	Sub-Unit 32	Description says there are some small exposed rocks at ... "Point Loma, including Navy facilities and NPS Cabrillo National Monument and USGS light station at end of point." According to statements made at the San Diego pubic meeting, there are no rocks in this area. The southernmost rock in the monument is at Sunset Cliffs, which is north of the Naval facilities and Cabrillo National Monument. Please correct.	48-WWW

#	Page	Line/Para/Sec	Comment	
72.	E-5	Appendix E	Delete the discussion of San Clemente Island and San Nicolas Island from Sub-Unit 34.	48-XXX
73.	E-5	Appendix E	Delete the discussion of San Miguel Island from Sub-Unit 35.	48-YYY



California Coastal National Monument RMP Response Form

(49)

For public input on the Draft California Coastal National Monument Resource Management Plan and Draft Environmental Impact Statement

Note: All items must be completed for form to be accepted

Today's Date: December 15, 2004

Your name (please print): John J. Lewallen

Representing (put an X in one box only):

☐ Self only

☒ Business, organization or agency (specify): Mendocino Seaweed Stewardship Alliance

Address: c/o Mendocino Sea Vegetable Co.

City: P.O. Box 455, Philo, CA 95466

State: CA Zip: 95466 Phone: 707-895-2996

Email (optional): mail@seaweed.net

Important Privacy Notice: Under the Freedom of Information Act, all written comments, including names and street addresses, will be available for public review upon request and ~~may be~~ published by the BLM during the planning process. As an individual, however, you can ask us to withhold your name and address. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety. If you checked "self only" above, and would like us to withhold your name, put an X in this box: ☐

Comments on the California Coastal National Monument Draft RMP/Draft EIS:

The following comments are endorsed by these Founding Members of the Mendocino Seaweed Stewardship Alliance:
John J. Lewallen, Mendocino Sea Vegetable Co.
Barbara Stephens
Edwin and Terry Nieves, Ocean Harvest Sea Vegetables
Larry Knowles, Rising Tide Sea Vegetables
Moon, Sea Breeze Sea Vegetables

Mail form to:
California Coastal National Monument
299 Foam Street
Monterey, CA 93940

Or Fax to: (831) 647-4244

Continue your comments on the back of this page, or on additional pages

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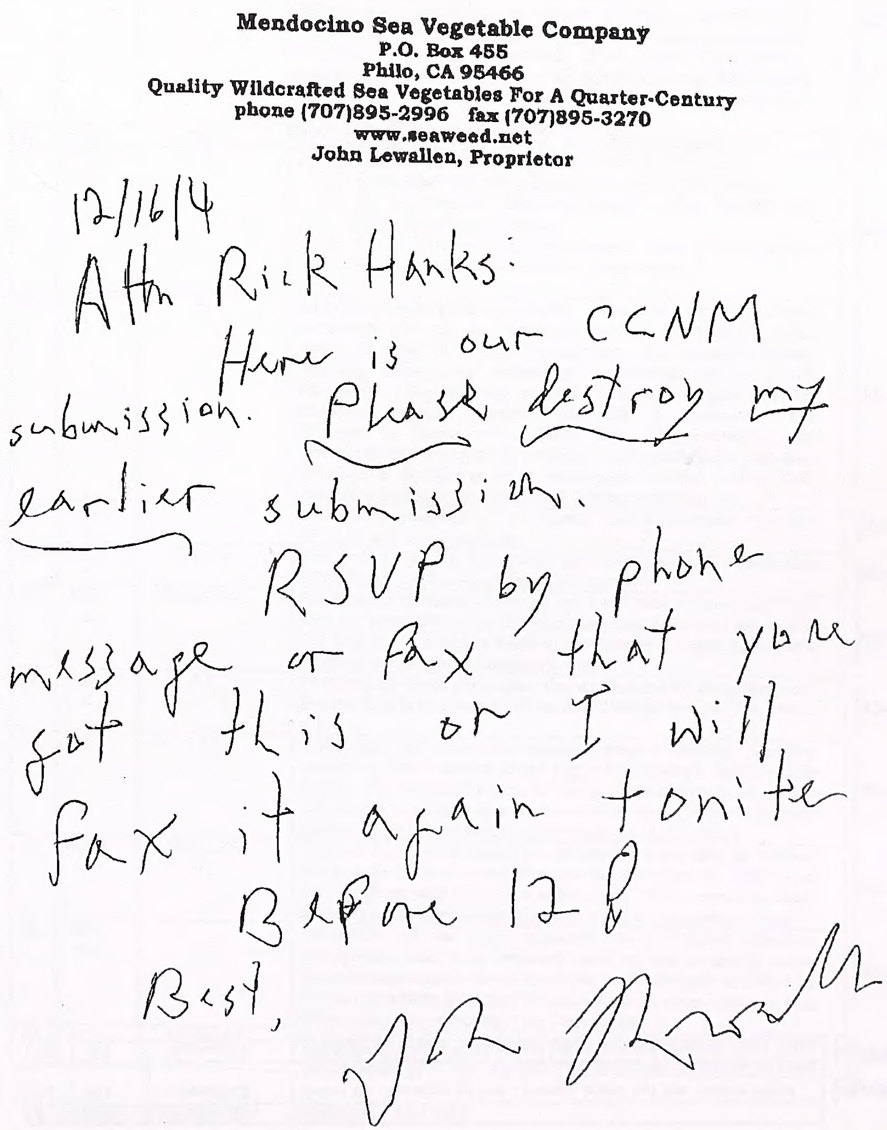

Mendocino Sea Vegetable Company
P.O. Box 455
Philo, CA 95466
Quality Wildcrafted Sea Vegetables For A Quarter-Century
phone (707)895-2996 fax (707)895-3270
www.seaweed.net
John Lewallen, Proprietor

12/16/4

Attn Rick Hanks:

Here is our CCNM submission. Please destroy my earlier submission.

RSVP by phone message or fax that you got this or I will fax it again tonite before 12.

Best,

To: Herrick Hanks, Director, California Coastal National Monument
From:Mendocino Seaweed Stewardship Alliance
Subject: Comment on the California Coastal National Monument Draft Resource Management Plan, page ES-12, "Stewards," and Draft Memorandum of Understanding between CCNM and the Mendocino Seaweed Stewardship Alliance..

The Mendocino Seaweed Stewardship Alliance is an association of hand-harvesters of wild seaweeds on the Mendocino Coast. A unique industry of cottage-industry sea vegetable wildcrafters has harvested and protected the sea vegetables of Mendocino since 1980. Today these seaweed-harvesting stewards supply a world market desperately in need of the nutritional and healing properties of Mendocino sea vegetables.

Mendocino seaweed harvesters always have led the struggle to prevent offshore oil drilling. Now we are joining in founding "Terminate Offshore Oil Leases." We insist that the EIS make clear that oil drilling off the California coast is totally inconsistent with the goals of the CCNM. The Monument, while offering a vision of the whole California coast as a living, vital ecosystem, offers no protection from offshore oil drilling. 49-A

Below is a Draft Memorandum of Understanding. We, the seaweed harvesters of Mendocino County, hope to work with the CCNM to protect the seaweeds, other life forms, and their precious and threatened ocean habitat.

DRAFT MEMORANDUM OF UNDERSTANDING

Whereas, the Draft EIS of the CCNM provides that: "Stewards will be select entities with ownership or management responsibility for a specific portion of the coast that adjoins part of the CCNM. These partners will agree to serve as stewards for that portion of the CCNM. Stewards will support resource inventory and monitoring, education and interpretation, and resource protection;" and

Whereas, the Mendocino Seaweed Stewardship Alliance is a loose association of cottage-level sea vegetable wildcrafters supplying top-quality sea vegetables to a world market in urgent need of the nutritional and healing properties of seaweed from clean ocean waters; and 49-B

Whereas, the undersigned members of the Mendocino Seaweed Stewardship Alliance have been acting as stewards of the Mendocino seaweeds and their clean ocean habitat for several decades, and will continue to do so, and

Whereas, the California State Department of Fish and Game has made Mendocino County an area free of large-scale kelp leasing or mechanical seaweed harvest, specificially to make a place for small-scale hand-harvesting of top-quality wild seaweeds; and

Whereas, Mendocino Seaweed Stewardship Alliance members have for many years hand-harvested wild seaweeds with great respect for nesting birds, marine mammals, human beach visitors, public officials, and the eternal regeneration of the sea vegetables, and

Whereas, the Mendocino Seaweed Stewardship Alliance operates as a self-regulating industry, harvesting ecologically for regeneration, in harmony with nature and people, as stewards of our specific harvest locations, emulating the Cahto, the Kashiya, the Wappo, and our other aboriginal Native American sea vegetable harvesters, who have been harvesting Mendocino seaweed in sacred harmony foruntold eons, 49-B

Therefore, we, the undersigned, members of the Mendocino Seaweed Stewardship Alliance, a loose association, would like to serve as stewards of our specific seaweed harvest locations for the California Coastal National Monument, protecting, monitoring, and interpreting the seaweeds and other life-forms of the Mendocino Coast.

/Signed/
John J. Lewallen, Mendocino Sea Vegetable Company
Barbara Stephens
Larry Knowles, Rising Tide Sea Vegetables
Terry Nieves, Ocean Harvest Sea Vegetables
Edwin Nieves, Ocean Harvest Sea Vegetables
Moon, Sea Breeze Sea Vegetables

(50)

Orbachkort@aol.com
12/15/2004 10:52 PM

To: cacnm@ca.blm.gov
cc:
Subject: CCNM Draft RMP/Draft EIS

I am concerned that the goals of the CCNM will not be served if recreational users, including fishermen, are chased off.

I admit, as a recreational fisherman, I am concerned that the Plan is going to restrict fishing near the CCNM rocks. I realize that the plan has no jurisdiction over use of adjacent waters, but there is language that sure sounds like it could restrict use of nearby water if only "appreciate from afar" were allowed, or only uses that 'do not disturb wildlife' were allowed. Just how far would that be taken? The 'plop' of a cast sinker could cause a seabird sitting on a rock to take flight; would that be 'disturbing wildlife"? **50-A**

However, my own interests and the stated goals of the Plan are not in conflict:

What I see missing in this plan is some recognition that if it were not for interested recreational anglers, this whole category of people very interested in the overall health of the ecosystem could become disinterested in a hurry. 'Out of sight, out of mind' could well set in if we are prevented from approaching the rocks.

Historically, the most ardent preservationists of the natural systems as a *whole* have been sportsmen (and women), beginning with Teddy Rooseveldt. The accomplishments of Ducks Unlimited and Trout Unlimited are legion.

I see the basic split as: Environmentalists want to save *each creature*; sport users (and to a lesser extent commercial users) want to save *populations*. This distinction has unfortunately polarized two powerful groups that should be working together. **50-B**

We as recreational fisherman of course recognize that use should not be unrestricted, and that in certain specific instances documented by *unbiased* scientific findings some forms of usage must be restricted. This has been the foundation of much Fish & Game legislation over the years, and few fishermen doubt the need for it, and overwhelmingly abide by the laws. **50-C**

I would like to see a stated recognition that by encouraging recreational use, including angling or spearfishing, a greater number of interested parties can be amassed to secure the stated goals of the plan. This should be fundamental and axiomatic, and part of the 'preamble' to the Plan. **50-D**

Kort Orbach

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(51)

12-16-04

California Coastal National Monument
Bureau of Land Management
299 Foam Street
Monterey, CA 93940
FAX 831-647-4244

Re: Draft Resources Management Plan and EIS for the California Coastal National Monument

Page ES-8. The "No Action Alternative" is by far the best. Governement already has endless overlapping layers of regulations protecting these islands, and the new regulations seem only meant to expand government expenditures and administrative pyramids for BLM and DFG. **51-A**

Page ES-1, 1-13, 2-9, 2-13, 3.9-2. "The rocks and small islands ... have been withheld from most land uses by BLM since 1983, and from mineral exploration and recovery since 1930." BLM wrote me 45 years ago that President Hoover's Presidential Proclamation dated 1929 removed all these rocks and islands from all public entry, not just from mineral exploration and recovery, and refused my application on one of these islands on that basis. No other mention of this withdrawal is mentioned in the document. A copy of the document should be enclosed in the appendix. It appears that BLM is either in error or legally inconsistent. **51-B**

The news releases describing Clinton's proposed designation said that some of the rocks and islands were being destroyed by rock quarries. At the time it seemed highly illogical that this could be possible since there are so many county planning regulations, Califorina Coastal Commission regulations, and DFG regulations. Nowhere in the document is there any mention of these particular rocks that were being destroyed. Please review the news releases and reveal whether they were just political hype meant to gain approval. **51-C**

Page 1-8, 2-15. It has been my experience that government regulations only worsen any protection of biological resources on these rocks and islands because they encourage college classes to strip all the interesting animals using exemption permits from government. The classes then let the animals die. I watched daily how Point Fermin suffered from this destruction in 1945-50, and it has never recovered. **51-D**

Figure 2-2a, CCNM Sub-Unit Map.. The six mile bulge in the jurisdictional boundaries for Reading Rock off from Redwood National Park (area #3) is not shown. **51-E**

Figure 2-2b. The state 3 mile limit is not shown for area #36. **51-F**

Figure 2-2c. The state 3 mile limit is not shown for areas #34 and #35. Doesn't the Cortez Bank also have an above sea level rock which would result in another 3 and 12 mile boundary area? **51-G**

Page 2-21. "... partnering with the NAHC would help to develop relationships with non-federally recognized Native American groups who may have an interest in stewardship of offshore traditional cultural properties (TCPs)." Racial discrimination is prohibited by the U.S. Constitution and California Proposition 209. Non-federally recognized Native American groups have no legal status, are not legally defined, and should not be given racial preference over any **51-H** other group. Use by tribes of non-traditional machinery such as motor vehicles should not be allowed, no matter what they imagine their unknown ancestors did.

Page 2-29. A distinction should be made between "permitted", that is, requiring permits, and "allowed", which does not require a permit. **51-I**

Page 2-30. There are already too many government interpretive signs cluttering the beaches. Please, no more signs! **51-J**

Page 2-38. Government already owns 80 percent of the land withing 1,000 miles of the Pacific Ocean and 55 percent of California. No more land acquistion is needed. **51-K**

Page 3.1-1. "Native American tribal lands" is incorrect, they do not own the land, it should be "Bureau of Indian Affairs trust lands". **51-L**

Figure 3.1-2. Santa Cruz Island and Santa Rosa Island are incorrectly labeled. **51-M**

Page 3.3-2. Guadalupe fur seals were made extinct by the San Diego Zoo in the 30s and were rediscovered in 1956. Zoos do not have a great history in protecting rare animals. **51-N**

Page 3.5-1 CFR 49 has a "Hispanic" definition which does not include "Portuguese". What is the basis for creating this new racial classification system? **51-O**

Table 3.9-1. Bird Rock near Santa Catalina Island is called White Rock Island by the LA County Assessor. It was coveyed by "Valentine Scrip", not "Scrip". **51-P**

Table 3.9-1 page 3. Is Reading rock off from Redwood National Park included? **51-Q**

Table K-1. "One quarter of the 52,794-acre Santa Rosa Island and the 60,645-acre Santa Cruz Island is owned by NPS; the remainder is owned by the The Nature Conservancy." is incorrect. The Nature Conservancy does not own any of Santa Rosa Island. The Nature Conservancy owns about 9/10 of Santa Cruz Island. **51-R**

Thank you for the opportunity to comment on the draft. Please send me a copy of the final documents.

Charles Wilson
P.O. Box 127
Orick, CA 95555-0127

State of California • The Resources Agency
Arnold Schwarzenegger, *Governor*
DEPARTMENT OF PARKS AND RECREATION • P.O. Box 942896 • Sacramento, CA 94296-0001
(916) 653-6725
Ruth Coleman, *Director*

December 16, 2004

(52)

Rick Hanks
CCNM Manager
U.S. Bureau of Land Management
299 Foam Street
Monterey, California 93940

Dear Rick:

Comments on CCNM Draft Resource Management Plan/DEIS (August 2004)

Thank you for the opportunity to review and comment on the draft California Coastal National Monument Resource Management Plan (August 2004). Our department has a special interest in the management of monument lands due to the close proximity of many state park system units and because of our ongoing collaboration with BLM on managing the monument.

We have no major concerns but offer the following suggestions and corrections:

- Figure 1-4c. Note regarding "State Park System: Properties not approved for classification" probably needs to be updated. However, the text is illegible as is anyway. Send a copy of the text and we can correct as needed. **52-A**
- Figure 1-4d. Asterisk and note on "Limekiln SP" can be deleted. The unit is now classified a State Park.
- Figure 1-4d. Add Estero Bay (CDPR) as recent Department acquisitions on the San Luis Obispo County coast (see enclosed map for site location). **52-B**
- Table 2-1. PG&E and Friends of the Elephant Seal may be considered as potential partners along the SLO Coast. **52-C**
- Table 2-5, p. 2-20 and table 3.4-1, p. 3.4-3. Table should read "Port San Luis" not "Port San Lucas." **52-D**
- Page 2-35. Interpretive themes might include intertidal resources. The diversity of species, endemism, geographic distribution along the coast, and habitat disturbance may provide valuable Interpretive material. **52-E**

Rick Hanks
December 16, 2004
Page Two

- Page 3.15-4. There appears to be missing language or a missing page. 52-F
- Section 4.6.3.4. It would be valuable to have a thorough inventory of cultural resources including both historic and prehistoric resources. The inventory should include an effort to document submerged archeological sites, historic and prehistoric. Several are known to occur along the coast. 52-G
- Appendix C-6. Add Limekiln State Park and Estero Bay (unclassified) projects. 52-H
- Table K-1. Add: 52-I
  - Limekiln State Park, SLO County.
  - Estero Bay (unclassified), SLO County, a few scattered rocks, exposed reefs, and sea stacks.

We appreciate the opportunity to provide comments on this report and look forward to opportunities for continued collaboration in the management of the monument.

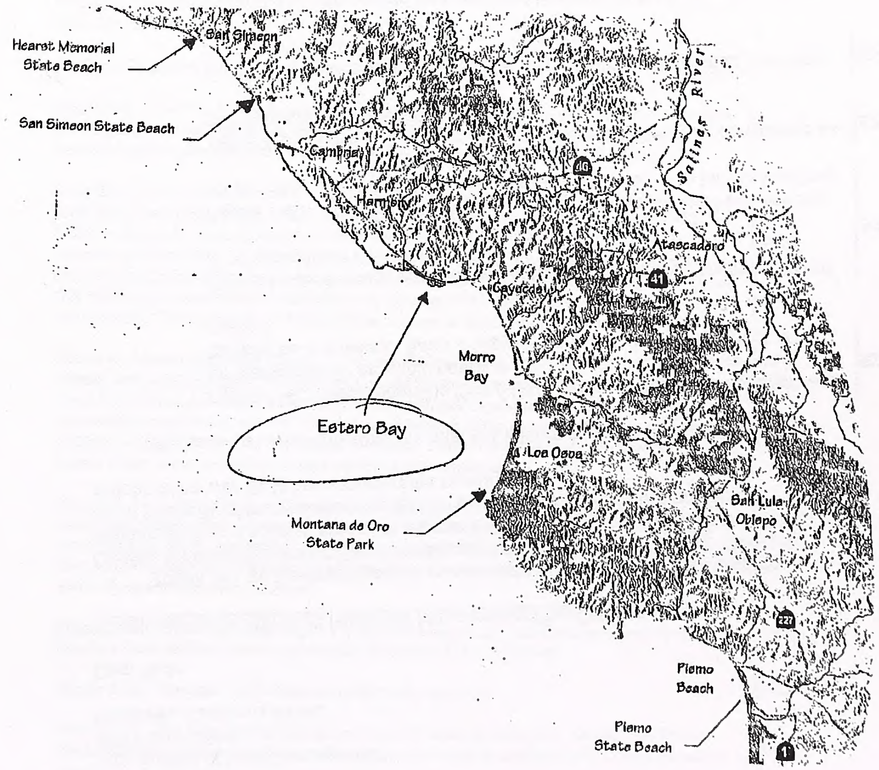
Sincerely,

Original signed by:

Richard G. Rayburn, Chief
Natural Resources Division

Enclosure

cc. Coastal District Superintendents


Hearst Memorial State Beach
San Simeon
San Simeon State Beach
Cambria
Harmony
46
Salinas River
Atascadero
41
Cayucos
Morro Bay
Estero Bay
Los Osos
Montana de Oro State Park
San Luis Obispo
227
Pismo Beach
Pismo State Beach
1

United States Department of the Interior

MINERALS MANAGEMENT SERVICE
Pacific OCS Region
770 Paseo Camarillo
Camarillo, California 93010-6064

(53)

7300

DEC 16 2004

Herrick E. Hanks
Monument Manager
Bureau of Land Management
California Coastal Monument
299 Foam Street
Monterey, California 93940

Dear Mr. Hanks:

MMS appreciates the opportunity to comment on this document and looks forward to working with you in the future. Our comments follow.

General Comments:
In the document, the authors refer to the concept of "encouraging" the enforcement agency to protect the area or resource. We encourage BLM to adopt MOUs and MOAs with the appropriate agencies to obtain permission to write citations or otherwise enforce requirements directly affecting resources in the Monument. MMS inspects many requirements on the platforms on behalf of the U.S. Coast Guard and EPA through MOUs and has found this to be a highly successful arrangement for both parties. 53-A

The document was clearly written; contained appropriate maps and diagrams, and was reader friendly. We also appreciate the ease with which we could review the document online.

We support either Alternative A or B and agree that BLM's focus for this monument should be protection of resources and education. 53-B

We recommend that under any alternative, BLM adopt a carefully administered permitting approach to research activities in the Monument. Many research activities potentially cause impacts to resources and good coordination and oversight is needed to ensure that impacts do not occur. 53-C

MMS is open to opportunities to share resources (scientific or educational) between MARINe (the Multi-Agency Rocky Intertidal Network which actively monitors rocky intertidal resources at 70 sites along the coast and offshore islands) and the Monument. We hope to continue to work with you on finding common projects of benefit to both groups. 53-D

Specific Comments:
Page ES-7. We agree with the recommendation to use the Cadastral services within BLM to accurately survey the rocks in the Monument. As you know, MMS has information which will help in the process as we have needed to map these rocks to determine Federal/State line boundaries offshore. 53-E

Page ES-7 ES.4.13. Regardless of the fact that this is a BLM site, the "listing of issues not addressed"—e.g. wild horses and burros--is rather odd and unnecessary considering the coastal nature of the monument. A more appropriate listing of issues which pertain to the monument (eg. mariculture) but are not discussed in the document is what is needed in this section. 53-F

Page 4.20-2 Water Resources. The document discusses the potential impacts of the various alternatives upon water quality but not the affect of water quality on the resources in the Monument. Since we know that water quality will directly affect resources, more discussion is needed about how BLM would identify and address problems to the Monument. 53-G

If you have further questions, please contact Mary Elaine Dunaway at 805 389-7848.

Sincerely,

Lynnette L. Vesco

Lynnette Vesco, Chief
Office of Environmental Evaluation

TAKE PRIDE IN AMERICA

Mendonoma Marine Life Conservancy (54)

P.O. Box 217
Manchester, CA 95459
(707) 895-2584

December 16, 2004

California Coastal National Monument
299 Foam Street
Monterey, CA 93940

Ladies & Geltlemen:

On behalf of the Mendonoma Marine Life Conservancy, I thank the Bureau of Land Management for the opportunity to review the Draft Resource Management Plan/Draft Environmental Impact Statement for the California Coastal National Monument.

MMLC's detailed response to the RMP/EIS is enclosed. Our response focuses on three areas:

I. MMLC's preferred alternative
II. MMLC's opposition to Alternative C
III. The threat to CCNM posed by offshore oil transportation and extraction

o MMLC supports the Resource Protection Emphasis Alternative (Alternative B). We find this alternative best supports MMLC's goal of promoting a healthy and bountiful offshore environment. 54-A

o MMLC finds Alternative C to conflict with BLM's primary goal of protecting the rocks and their inhabitants. 54-B

o MMLC finds that oil poses the single most identifiable and probable threat to the individual geologic formations the make up CCNM and the life sustained upon and around those formations, and urges BLM to place emphasis on protecting the Monument from oil spills. 54-C

Sincerely,

Rob Cozens

Rob Cozens, Staff Conservator

Promoting A Healthy & Bountiful Offshore Environment

Comments on the

**California Coastal National Monument
Resource Management Plan**

Offered by the

Mendonoma Marine Life Conservancy

December 16, 2004

The individual geologic structures that comprise the California Coastal National Monument are the defining features along much of California's coastline. These same rock formations and their underwater extensions provide sustenance and shelter for all manner of living creatures, and unique recreational and commercial opportunities for mankind.

The MMLC seeks a better understanding of marine life and its use patterns on the Mendocino County and northern Sonoma County coast. This area is a highly productive marine environment, yet the CCNM EIS shows it as little studied. Our comments on the draft document reflect our focus, and may apply to the rest of the California coast as well.

The mainland area of our concern has life forms that are either out of range, or occur only here, or are rare elsewhere but relatively abundant here. The rocks and islands are likely to have similar or greater scientific significance, so they need strong protection and careful monitoring of any research. The Point Arena Mountain Beaver is a medium-sized endangered land mammal that formerly occurred more widely in our area. The Laysan albatross that winters in Point Arena Cove may be an outrider of a small population on offshore rocks and islands.

Magnificent Frigate Birds and Elephant Seals are seen from time to time on the bluffs and beaches of Gualala. Plants of special concern that are relatively abundant here include the Swamp Harebell and the Coastal Bluff Morning Glory. Natural history enthusiasts are trying to secure identification of land invertebrates that may be previously unknown to science. 54-D

River otters are a protected species. They live here and take to the ocean where people sometimes mistake them for sea otters. They could well be using some of the rocks and islands.

The Mendonoma Marine Life Conservancy commends President Clinton for creating CCNM, and applauds the Bureau of Land Management for its effort to protect and to promote public appreciation of CCNM. MMLC members have reviewed the BLM's Draft Resource Management Plan/Draft Environmental Impact Statement for the California Coastal National Monument, and offer the following comments in response. Our comments focus on three areas: 54-E

I. MMLC's preferred alternative
II. MMLC's opposition to Alternative C
III. The threat to CCNM posed by offshore oil transportation and extraction

MMLC's Preferred Alternative

Alternative B has two portals, one at the midpoint of our area of concern. This is much more realistic than the long list of existing public lands along the coast in Alternative. A. The website could list those places so when people click on them, they could see what CCNM resources are there, what trail to take and the significance of the rocks. That would be enough. Multiple portals under various jurisdictions could exhaust the resources of BLM and the CCNM without adding to exisiting protections. 54-F

The only negative impact of Alternative B listed in the Chapter 4 of the document is a possible effect on recreation. BLM could mitigate this by adding new, small accessways and overlooks with picnic tables that allow people to view monument resources. On our coastline, rocks well-known to the public for generations are being lost to public view through private purchase for gated mansions. 54-G

The protection of cultural resources throughout the monument is of special importance here. The Kashaya Pomo of Sonoma County and the related Manchester- Point Arena Band of Pomo Indians have ties with UC Bekeley and San Francisco State. The tribes of Mendocino County are involved in the Sinkyone Intertribal Wilderness Park in the northwest corner of the county. 54-H

They also have extensive knowledge of the seasonal use patterns of marine life into the distant past, and the trail which inland people used to access marine reources. BLM is working to develop a trail system along the Sacramento River, and with the knowledge of the tribes of our area, BLM could extend trails to the coast and the portal at the mouth of the Garcia River. 54-I

The Kashaya say that they have been here at least 10,000 years. Geologists tell us that the coastline here 10,000 years ago was out 11 miles from the current shoreline. Thus, the lands in the monument are for them like Lyonesse is to the people of West Britain, and the rocks, pinnacle and islands can be seen as the last remnants of their home that sank beneath the sea. 54-H

MMLC's Opposition to Alternative C

MMLC finds Alternative C to conflict with BLM's primary goal of protecting the rocks and their inhabitants. 54-J

The Threat From Oil

In preparing a list of of potential threats to the rocks that comprise CCNM and the animals that shelter on & around them, we can identify no other single thraat that has the likelihood of occurring, the potential for wide-spread damage, and the long-term toxic effects of oil. As early as 1983, Dr. Robert Howarth of Woods Hole Marine Biological Laboratory wrote, ""That oil is toxic is now beyond dispute."

The effects of oil on the marine environment were documented in detail by Anne Simon in *Neptune's Revenge*:

Oil is toxic at concentrations well below 10 ppb... By contrast, an oil spill can dousa marine life with concentrations as great as 7,000 times this, an event which staggers the imagination.

The first terrible days of an oil spill attest to oil's toxicity. Daath is immediate. The blackanad stinking blankets of bodies on the beach or rocky shore is the visible result. An unforgettable axample of this is the breakup of the tanker Amoco Cadiz off Brittany in 1978, spilling a quarter of a million tons of oil into the sea. On its way ashore the oil lapped a rocky bird sanctuary, killing 3,000 saabirds. "Saa urchins washed up on the beaches in windrows, 16 million per mile of beach," an observer reports. "Later came the razor clams, than cockles. . . a 2,000 acre salt marsh 90 miles [away] *was covered waist-deep in oil." Oil coverad oyster beds, killing finfish. Residents painted signs, "La mer est morte."* 54-K

Oil killad the entire crop of local seawead that supplied 75 percent of France, destroyed the fishing business and 80 parcent of the oyster crop. Marine biologists estimata a sevan- to ten-year recovery tima for the badly battered Brittany coast. The estimate may be low for parts of this coast... Oil...stays in sediments for at least twelve years... Bast guass for oil spillad in the Straits of Magellan in 1974 is fifteen to thirty years on the beaches, over a hundred years for sheltered tidal flats and marshes.

Oil is a mix, hundreds of hydrocarbons welded together over millannia. Lighter than water, spilled oil forms a slick that slides across the sea, killing whatever might swlm across its path, terrifying coast dwellers. Whan the slick starts to "weathar" and break up, there is a general reliaf. People assume tha threat is over, the oil gone. As it turns out, the revarse is trua.

Tha oil exists, unseen, a portion of it more virulent than before, having become more toxic, carcinogenic and water-soluble whila floating in the sun. It has oxidized, adding oxygen atoms to its hydrocarbons...

4

...[W]hen the oil slick disappears, it is... time to worry. Soma of the altered oil sinks to the sea floor, where it is by no means less troublesome. It is transported there in the fecal pellets of zooplankton, innocently grazing in the slick. ...a typical zooplankton population could transport 3 tons of oil par square kilometer to the bottom every day. Another route is hitching a ride on sediment particles swirling in the water. Adding an oil droplet makes enough weight for a swift trip to the bottom, be it miles down in the deep or in the shallows near shore.

Oil kills on the bottom as on the baach. The population perishas or escapes, if it can crawl or swim away. Species which can survive such an oil bath mova in. Like other opportunistic species, they are of a lower, tougher evolutionary order than the regular residents, less productive, less diverse. The oil sinks into the sediments whera...it is likaly to stay. Opportunists taka over, moving avolution down a step, and the resident oil, oozing out of the sediments for years, keaps it that way.

Oil...is an all-around blue ribbon pollutant. It dastroys plankton, fish eggs, larvae, sensitiva marine organisms. Its carcinogenic hydrocarbons are incorporated into human food sources. It is toxic whan spilled into the saa and may get more so. It can stay in the sediments for at least twelve years, parhaps for a century. 54-K

This is the reality of the threat to CCNM posed by oil, and, as noted earlier, we are hard pressed to identify any other threat to CCNM that has anywhare near the potential for wide-spread, long-term damage. With this in mind, we applaud BLM for its decision to participate in the National Oil & Hazardous Substancas Pollution Contingency Plan; however we faal BLM should also publish its own assessment of the threat potential of offshora oil transportation & extraction.

Many, if not all, of Califomia's coastal countias have oil spill contingency plans administered by the local emergency operations agency. MMLC urges BLM to look to the State & county emergency operations agencies for partners in addressing the threat of oil. In addition, California, Oregon, Washington, British Columbia, & Alaska have formed the Pacific States - British Columbia Oil Spill Task Force [<http://www.oilspilltaskforce.org>]. MMLC encourages BLM to seek membership on the Pacific States - British Columbia Oil Spill Task Force, or, as a minimum, enlist the Task Force as a CCNM partner.

This concludes MMLC's comments regarding the CCNM RMP/EIS. Once again, we thank BLM for the opportunity to comment. If BLM would like additional information or clarification regarding MMLC's position & recommandations, we will provide it if asked.

5

(55)

146 La Grande Ave.
Moss Beach, CA 94038

December 16, 2004

Mr. Rick Hanks
CCNM Manager
California Coastal National Monument
299 Foam Street
Monterey, CA 93940

Dear Mr. Hanks,

I am responding to the September 22, 2004 Fact Sheet and Public Meeting notice that was sent to my father, Dr. John Jeffredo, President and CEO of the not-for-profit Native corporation, Maritime Shoshone, Inc. and founder of the Island Gabrielino Group. Dr. Jeffredo passed away this year, and the responsibility to comment on the CCNM Draft RMP/Draft EIS for certain Luiseno and Island Shoshone (or Island Gabrielino) descendants and Maritime Shoshone, Inc. has passed to me, Dr. Jeffredo's youngest daughter. Dr. Jeffredo was a member of the federally-recognized Temecula Band of Luiseno Mission Indians. His children and grandchildren are also members of this federally-recognized Band.

I have read the Draft RMP/Draft EIR for the CCNM with care. Besides a strong background in the native language and religious traditions of my people, my qualifications include a graduate degree in anthropology from Stanford University, where I was a National Science Foundation Fellow, and two undergraduate degrees, one in anthropology, the other in environmental studies, from the University of Southern California. A folklorist/anthropologist by profession, my areas of expertise specifically concern indigenous southern Californians and environmental and cultural conservation issues.

As the document correctly states, California's offshore rocks and islands have been used by Native Americans for many millennia.

In Native Southern California, the Island/Adjacent Mainland Coast Shoshones (whom have also been referred to as Island/Coastal "Gabrielinos") prized coastal locations which offered a combination of high cliffs and lower-lying rocky tidal zone and/or offshore rocks and rock formations, as these locales allowed for year-round fishing (in the winter, when stronger surf could more easily sweep Island/Adjacent Mainland Coast Shoshones "over to the inside of the ocean," offshore rocks and rock formations were avoided in favor of Los Angeles-Orange County's tall coastal cliffs, from which nets and lines were dropped, sometimes from heights of 100 feet or more above the kelp-laced waters (Island Shoshone elder in conversation with Louise V. Jeffredo-Warden, February 22, 1996, Los Angeles County).

Two areas in particular were highly valued by my Island Shoshone elders for these benefits, the Palos Verdes Peninsula, which was known for the greatest concentration of place names and settlement sites "than is found in any other region of similar extent" in the so-called "Gabrielino" homeland (McCawley 1996: 63), and what is now called Los Alisos Beach near Dana Point, where summer fishing settlements were annually established, lobster and abalone abundantly gathered, and the offshore resource now known as "Coffin Rock" expertly utilized for fishing purposes.

While we understand that some of these resources are not currently included in the CCNM, it is also our understanding that they may at some point be incorporated in the CCNM. Thus, I would welcome the opportunity to discuss these cultural resources with your staff. 55-A

Rick Hanks
Page 2
December 16, 2004

The Draft RMP/Draft EIR for the CCNM also highlights the fact that certain of the state's offshore rocks and islands were used as landmarks by native peoples. It also emphasizes the importance of these offshore rocks and islands as visual resources. Noting that astronomical knowledge and expertise has long been tied in human prehistory to maritime navigation and to success in subsistence activities such as fishing and shellfish procurement, we wish to add that certain of southern California's offshore islands and rock formations (as well as certain coastal configurations) were used by Island/Adjacent Mainland Coast Shoshones as prominent horizon markers with which to track and mark the setting positions of the sun, and, therefore, the seasons. Such offshore visual resources also exist in Baja California. 55-B

Finally, as the Draft RMP/Draft EIR also points out, some of California's "rocks and islands also play a role in local Native American mythology and cosmology."

Highly significant cultural information regarding resources on and associated with the Southern Channel Islands still exists within our impacted, yet remaining, numbers. Only yesterday an elder sang a song to me that, to my grateful surprise, included what appears to be specific religious information regarding Bird Rock, a small island north of Catalina's Two Harbors area. 55-C

On behalf of my family and lineage, and in representation of Maritime Shoshone, Inc., I welcome informing your staff about these and other cultural resources on and surrounding the Southern Channel Islands, and within the coastal stretch from Malaga Cove in Los Angeles County to Los Alisos Beach in Orange County. After reading the Draft RMP/Draft EIR, I am confident some of the cultural and religious values associated with one of our traditional territorial areas can greatly assist in enhancing the public's visits to certain aspects of the CCNM, creating rewarding educational experiences at these beautiful places for Native and non-Native alike. 55-D

On behalf of my late father and his descendants, thank you for the notice and opportunity to respond to this document. As my father's mail is now forwarded to me, please address any additional correspondence regarding the CCNM to my address above. I can also be reached at lvjeffredo@comcast.net.

Sincerely,

LV Jeffredo Warden

Louise V. Jeffredo-Warden for
Maritime Shoshone, Inc.

STATE OF CALIFORNIA ARNOLD SCHWARZENEGGER, *Governor*

CALIFORNIA STATE LANDS COMMISSION
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December 17, 2004

(56)

Rick Hanks
CCNM Manager
U.S. Bureau of Land Management
299 Foam Street
Monterey, CA 93940

SUBJECT: California Coastal National Monument Draft Resource Management Plan/Draft Environmental Impact Statement, SCH #2004094006.

Dear Mr. Hanks:

Staff of the California State Lands Commission (CSLC) has reviewed the subject document. Under the National Environmental Policy Act (NEPA), the Bureau is the Lead Agency and under the California Environmental Quality Act (CEQA), the CSLC is a Responsible and/or Trustee Agency for any and all projects, which could directly or indirectly affect sovereign lands, their accompanying Public Trust resources or uses, and the public easement in navigable waters.

General

By way of general background, upon admission to the Union in 1850, California acquired nearly 4 million acres of sovereign land underlying the State's navigable waterways. Such lands include, but are not limited to, the beds of more than 120 navigable rivers and sloughs, nearly 40 navigable lakes, and the 3-mile wide band of tide and submerged land adjacent to the coast and offshore islands of the State. These lands are managed by the SLC.

The SLC holds its sovereign interest in these lands subject to the Public Trust for commerce, navigation, fisheries, open space, and preservation of natural environments, among others. The SLC is particularly concerned with the natural resources and public recreational opportunities of lands under its jurisdiction.

The document describes the potential environmental effects of alternative management strategies for the California Coastal National Monument (CCNM). The CCNM is composed of more than 20,000 rocks and small islands that are spread along the entire 1,100-mile coastline of California. The purpose of the Resource Management Plan (RMP) is to establish guidance, objectives, policies, and management actions for the lands of the CCNM. The RMP identifies management actions that can be taken by a larger group of partner agencies and entities with stewardship or regulatory responsibilities in California's coast.

Mr. Rick Hanks 2 December 17, 2004

The CSLC is identified as one such partner, and more specifically, is one of three state agencies, along with the Department of Fish and Game and the Department of Parks and Recreation, that have requested cooperating agency status. CSLC staff supports the goals of the RMP and is happy to provide assistance to the Bureau's efforts, to the extent that staff and resources allow. 56-A

The CSLC also administers the Shipwreck and Historic Maritime Resources Program (California Public Resources Code sections 6309, 6313, and 6314). The CSLC would like BLM to recognize the State's ownership of abandoned shipwrecks on the State's tidelands and submerged lands as provided by Congress in the Abandoned Shipwreck Act of 1987. It is quite likely that there are numerous instances where a shipwreck may cross between Federal and State jurisdictional boundaries. In these cases, the CSLC asks for cooperation to jointly manage such shipwrecks in the public interest. 56-B It is also quite likely that Native American sites may lie partly submerged and partly above the mean high tide line, and thus cross between Federal and State jurisdictional boundaries. CSLC requires permits for any human disturbance of archeological or historical resources under its jurisdiction whether for archeological research, or, in the case of some shipwrecks, for commercial salvage. Such activities are subject to review under the CEQA and approval by the CSLC. For proposals involving cultural resources that cross jurisdictional boundaries, joint review of such proposals is requested. 56-C

Specific Comments

1. Page 2-20, Table 2-5 (also p. 3.4-3, Table 3.4-1): Is the shipwreck listed at Point Arguello the SS *Yankee Blade*? If so, it has been listed on the National Register of Historic Places. For the portions of the wreck that are on the State's tidelands or submerged lands, the State claims ownership and jurisdiction over disturbance for archeological research or commercial salvage. 56-D

2. Page 2-20 and 2-21: CSLC supports interpretation of shipwrecks and non-invasive public access by responsible divers. CSLC requests that BLM consult the CSLC on management issues related to shipwrecks and development of a "Shipwreck Trail." 56-E

3. Page 3.4-3: Regulatory Setting: CSLC jurisdiction over shipwrecks on the State's tidelands and submerged lands should be mentioned (California Public Resources Code sections 6309, 6313, and 6314). As with the other State agencies listed, CEQA may be triggered by discretionary actions of the CSLC. 56-F

4. Page 3.5-2, Section 3.5.2.3 Spiritual and Cultural Appreciation, last sentence. The reference to Section 3.3 should be 3.4. 56-G

If you have any questions, please contact me at sanderd@slc.ca.gov or by telephone at (916) 574-1880.

Sincerely,

Dwight E. Sanders

Dwight E. Sanders, Chief
Division of Environmental
Planning and Management

cc: State Clearinghouse and Planning Unit
P.O. Box 3044
Sacramento, CA 95812-3044

Nadell Gayou
The Resources Agency
901 P Street
Sacramento, CA 95814

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(57)

SIERRA CLUB
FOUNDED 1892

California Coastal Program
Mark Massara, Director

Mr. Rick Hanks
Manager
California Coastal National Monument
Monterey, California 93955

Re: Sierra Club Comments on CCNM Draft Resource Management Plan

Dear Mr. Hanks:

Sierra Club appreciates this opportunity to comment on the Bureau of Land Management's (BLM) California Coastal National Monument (CCNM) Draft Resource Management Plan/Draft Environmental Impact Statement (DRMP/DEIS).

Sierra Club views the management of this new National Monument, part of the National Landscape Conservation System (NLCS) as an ideal opportunity for the Bureau to vigorously demonstrate its relevance and effectiveness as a modern, 21st century stewardship agency. The BLM manages more of the federal public domain than any other federal land-managing agency. As more and more privately owned portions of the land mass of the U.S. become covered by pavement and development, and as pressure from an increasing population for more intensive future development grows, the BLM's commitment to stewardship of our remaining natural resources becomes more important than ever. BLM's ability to conduct this stewardship of the resources under its care in the face of varied pressures for development and/or commercialization without impairment for future generations will be a test of its continuing relevance to American society. We hope the BLM will pass the test with flying colors. 57-A

Generally speaking, and regarding the BLM's broad management approach, we wish to warn the BLM against too much reliance on "collaborative partnerships" (as discussed on p. EIS-12.) Obviously the BLM must cooperate closely with the agencies that are its core-managing partners. But in working or collaborating with private entities that have a commercial profit-making focus the BLM risks disenfranchising segments of the population not included in such partnerships. Any partnerships imply special privileges to the partner that are not shared by others. 57-B

For example, we urge BLM to avoid plans to market tourism, including tourism partnership opportunities, (see p. 2-35) as incompatible with the non-commercial character of the monument. The inclusion of such marketing plans in Alternative A is one of the major reasons why we cannot support that approach (See below.) 57-C

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ALTERNATIVES:

We support Alternative B, the Resource Protection Emphasis Alternative. This alternative seems most closely to approximate the goals of the Presidential Proclamation that designated the CCNM. 57-D

Alternative C expresses contradictory objectives; that is, its claim to provide resource protection is contradictory to "a focus on human activity along the coast." (see p. 2-14.) 57-E

We support the objectives common to all alternatives of maintaining current visual quality and landscape integrity and ***to preserve the existing character of the landscape*** (emphasis added.) **We see this preservation of existing character as the essential landscape goal that the monument management must assure.** Over a major portion of the CCNM, if not virtually all of it, the existing, and even defining, character is a wilderness character (see p. 2-17, under special designations.) The character most strikingly obvious to the observer of most of the monument is its natural condition, unmodified by human actions and with the imprint of human activities substantially unnoticeable. 57-F It is vital to maintain this existing wild character, that generally appears to have been affected primarily by the forces of nature, unimpaired for the future, and for future generations to enjoy. Alternative B provides the best vehicle for maintaining this existing character, including the maintenance of cultural remains that fit into this dominant wild character of the landscape. Alternative B most certainly precludes the consideration of recreational activities or research and education activities that would impair the long-term existing character of the CCNM. 57-G Additional special designations should be considered only to the extent that they aid in, and augment the retention of the existing character of the CCNM. (See p. 4.21-1.) 57-H

We support further mapping and recording of rocks and islands only to the extent that no permanent markers or other visual impairments are left in place. (p. 2-18, cadastral support). 57-I

We support the permanent protection of all significant cultural resources, as outlined in Alt A (p. 2-30) and Alt B, especially the commitment to consult with and coordinate with interested Native American tribes regarding stewardship of these cultural resources. However, should tribes desire commercial development of cultural resources, this should not be permitted as it would impair existing character of the monument.

In addition, proposals for a "shipwreck trail" (p. 2-21) should be limited to non-impairing activities. 57-J

We support the objective of Alt. B that research and inventory "would be limited to those activities with no potential to adversely affect monument (wildlife, vegetation) resources." (p. 2-44). However, it is stated (p. 2-46) "exceptions may be granted in cases of unique opportunity with very high value that cannot be conducted elsewhere." Such a statement is a potential loophole that could lead to too many exceptions, and we urge this statement be removed or much more strictly controlled. 57-K

The limitation of "remote evaluation" is mentioned, but we urge BLM to remember that even "remote" over flights of helicopters or fixed-wing aircraft can seriously disturb wildlife; no low-level over flights should be permitted. 57-L

We support Alternative B's prohibition on invasive plant species and/or management activities that could result in adverse effects on native plants. (p. 2-43) 57-M

We also support Alternative B's limitation of points of recreational access to existing mainland facilities. The description of "recreation programs" (on p. 2-45) and the goal to continue to provide recreation programs along the coast primarily through the use of state and local government facilities" should also add the word "existing" in order to read "primarily through the use of *existing* state and local government facilities". 57-N

In conclusion, Sierra Club thanks BLM for undertaking this CCNM resource management effort. In addition to supporting Alternative B, the Resource Protection Emphasis Alternative, Sierra Club hopes that BLM will (1) manage the CCNM protectively so as to maintain the wilderness qualities of the area; 57-O and (2) That BLM will develop and provide educational materials that will inform the public about the many benefits of keeping the CCNM and these resources wild and undeveloped; 57-P and (3) that research or other scientific projects should be conducted in accordance with the maxim that they shall maintain the wilderness qualities of the CCNM; 57-Q and (4) that a detailed wildlife inventory, including sensitive species, should be prepared at the earliest opportunity. 57-R

Thank you for this opportunity to comment and please do not hesitate to contact us if we can provide you with any further information.

Sincerely,

Mark A. Massara, Director
Sierra Club Coastal Programs

United States Department of the Interior

NATIONAL PARK SERVICE
Point Reyes National Seashore
Point Reyes, California 94956

(58)

IN REPLY REFER TO:
L7619

December 16, 2004

Mr. Rick Hanks
Manager
California Coastal National Monument
299 Foam Street
Monterey, CA 93955

Subject: CCNM Draft Resource Management Plan/Environmental Impact Statement

Dear Mr. Hanks:

We appreciate the opportunity to comment on the California Coastal National Monument (CCNM) Draft Resource Management Plan/Environmental Impact Statement produced by the Bureau of Land Management (BLM). The purpose of the CCNM plan is to establish guidance, objectives, policies and management actions for the lands of the CCNM administered by BLM. In addition to the comments below, we will provide more detailed comments in January 2005.

The Point Reyes National Seashore is a unit of the National Park Service and the only National Seashore on the Pacific Coast. Established by Congress in 1962, this geologically unique peninsula encompasses 71,046 acres of sandy beaches, coastal cliffs and sea stacks, marine terraces, coastal uplands of mixed grassland, coastal scrub, and 22,000 acres of estuarine and marine waters. The shoreline length extends approximately 120 miles and the boundary of the park extends ¼ mile offshore. The park is bordered by two National Marine Sanctuaries (Gulf of the Farallones and Cordell Bank), a National Wildlife Refuge, several state Areas of Special Biological Significance, numerous state and regional parks such as Tomales Bay State Park, and the CCNM in subunit 16.

In 1976, Congress designated 32,000 acres as wilderness, including much of the waters within the ¼ mile boundary. Located near the San Francisco metropolitan area, this area is one of the most accessible within the United States wilderness system. Point Reyes is the center of one of only a few coastal upwelling marine ecosystems in the world. Located at the convergence of a number of ocean currents, adjacent waters are rich in nutrients and support an abundant fishery and associated fauna. Several marine areas along the Point Reyes coastline have been recognized for their biological significance and receive some protection. The park supports a unique and varied landscape that has been subject to a broad range of human and natural events. The cultural history of Point Reyes is equally rich, including the oldest shipwreck of North America, the San Augustin, and the recognized landfall of Sir Francis Drake.

First, we commend the BLM for the excellent vision statement and management focus of protection, research, education and planning, presented in the CCNM plan. There are several areas of potential collaboration between CCNM and Point Reyes National Seashore, and we look forward to working with you on resource protection, education and research programs of mutual interest. **58-A**

Several areas of mutual interest are addressed below and we will follow up with more detail in another letter in January 2005.

- The National Park Service has a protection program that includes enforcement and has the capacity and the regulatory authority to enforce federal laws within park boundaries. The CCNM plan should clarify that NPS has enforcement authority on NPS lands and that authority extends ¼ mile offshore within the boundary of the park. The BLM CCNM plan should also include language in Table 2-1 and other text references to enforcement that BLM will coordinate with NPS in enforcement. **58-B**

- There is potential for collaboration in several other programs including interpretation, education and consultation on cultural and natural resources.
    - The park has a well-developed interpretative program, including three visitor centers with a visitation rate of around 2.4 million visitors per year. Both NPS and CCNM would benefit from educating the public about the value and natural and cultural resources of the CCNM.
    - The park has developed curriculum guides for middle schools in California, several of which pertain to the marine environment including elephant seals. **58-C**

- The park also has a strong science coordination and monitoring program at Point Reyes. The Pacific Coast Science and Learning Center is a program at the park that facilitates and coordinates research opportunities in the park.
    - Inventory: Most recently, the park worked with NOAA and USGS to conduct a subtidal mapping project of the waters off of the park. The park is also working with Bodega Bay Marine Laboratory to install and maintain CODAR sites in the park to map nearshore currents. There are several other areas of mutual interest that CCNM and the park could collaborate in conducting inventories in the region.
    - Monitoring: The park has several long-term monitoring studies and associated data sets that relate to the marine program including for pinnipeds, rocky intertidal community, marine mammal strandings and western snowy plovers. There are several other areas of mutual interest that CCNM and the park could collaborate in conducting monitoring in the region. **58-D**

- There are numerous opportunities for collaboration in natural and cultural resource consultation and protection. Many of the species that reside in and migrate to the park traverse the waters of the CCNM. Numerous seabird roosting and nesting colonies occur onshore at Point Reyes and there are several major pinniped haul out sites. For example, the northern most breeding colony of northern elephant seals occurs at Point Reyes Headlands, and the largest concentration of breeding harbor seals in California occurs at **58-E**

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- Point Reyes on sites ranging from Bird Rock in the north to Stormy Stack at Double Point. 58-E
    - The CCNM plan refers to protecting seabird and pinniped breeding sites but does not note the importance of protecting these sites during the non-breeding season. For example, brown pelicans roost at numerous offshore rocks at Point Reyes during the non-breeding season, and harbor seals haul out on colonies daily. All pinnipeds require resting onshore to molt which occurs annually. We recommend that these sites be protected year round, regardless of breeding status. 58-F
    - We recommend that the plan include additional potential human sources for disturbance to wildlife including surfing, scuba diving and abalone diving. Harbor seals are currently disturbed by these activities at Point Reyes.
    - The CCNM and the park have the opportunity to mutually identify areas and levels of special protection for unique features and highly sensitive species. The park is currently participating in meetings of the multi-agency Marine Protected Area Center. 58-E

- The National Park Service has an extensive program for managing invasive species. Specifically, NPS has an invasive plant restoration team that maps and removes invasive plants. They have conducted extensive removal efforts of ice plant and pampas grass on the coastal bluffs of Point Reyes, for example. This team is highly trained and mobile for working in all of the parks in California. The CCNM plan references the need manage invasive plants. We recommend that the CCNM plan include the potential introduction of invasive species by people. Potential pathways for the introduction of invasive species include footwear and equipment. With reference to the use of pesticides and herbicides to remove invasive species, we recommend that the plan include the potential effects on native species in addition to effects on humans. The literature is replete with information on the harmful effects of these chemicals on native fauna and flora. 58-G

- Under the physical resources assessment, we recommend that the CCNM plan include water quality and air quality effects from surface and subsurface water resources. Presently, these effects are not noted. 58-H

- We recommend that the CCNM plan clarify the boundaries of Point Reyes National Seashore as a National Park Service Unit. Presently, the Map Atlas for subunit 16 does not indicate the ¼ mile boundary of the park. 58-I

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We appreciate the opportunity to comment on the CCNM plan and recognize the long-term importance of the document in guiding management. We look forward to collaborating in the management of these exceptional resources, using sound science to inform management and to achieve our mutual goals of resource protection. Should you have any questions, please contact me at 415-464-5101.

Sincerely,

Don L. Neubacher
Superintendent

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December 16, 2004

Mr. Rick Hanks
Monument Manager
California Coastal National Monument
Bureau of Land Management
299 Foam Street
Monterey, CA 93940

VIA FACSIMILE [831-647-4244] & E-Mail [cacnm@ca.blm.gov]

RE: Public Comment on Draft California Coastal National Monument Resource Management Plan and Draft Environmental Impact Statement

Dear Mr. Hanks:

The National Marine Manufacturers Association (NMMA) appreciates the opportunity to present the Bureau of Land Management (BLM) with the following comments in response to the Draft California Coastal National Monument Resource Management Plan and Draft Environmental Impact Statement ("Draft Plan").

NMMA is the nation's largest recreational marine industry association, representing more than 1,500 boat builders, engine manufactures, and marine accessory manufacturers. NMMA members collectively produce more than 80 percent of all recreational marine products made in the United States. With 13 million registered boats and almost 72 million boaters nationwide, the recreational boating industry contributes $30 billion and 400,000 jobs annually to our nation's economy.

The health of America's marine resources is of vital importance to NMMA members and NMMA appreciates the Bureau of Land Management's efforts to coordinate and improve the management of the rocks, islands, pinnacles, and other land masses off the coast of California.

Although the Draft Plan serves only as a conceptual framework for the management of the California Coastal National Monument (CCNM) and does not itself establish or specifically propose any new regulations, NMMA respectfully offers the following comments in order to assist BLM and its state and local partners as they proceed in developing a management plan that could have far-reaching implications for the recreational boating community in California and elsewhere.

Contribution of Boating to California's Economy

59-A

In California, the boating industry is substantial. The Draft Plan acknowledges that "tourism is a major part of California's economy, generating more than $75 billion in direct travel spending,

supporting jobs for more than 1 million Californians, and generating $5 billion in direct sate and local tax revenue."[1]

With respect to recreational marine manufacturing and recreational boating specifically, the economic numbers are equally impressive. The most recent economic impact study available puts the boating industry's contribution to California's Gross State Product (GSP) at approximately $5.8 billion annually.[2] Total annual boater spending in the state approximates $8.6 billion, not including the purchase of boats, trailers, and vehicles to haul them, and some $1.3 billion is spent each year on boat maintenance and upkeep. In 2003, sales from powerboats, engines, trailers and accessory parts reached nearly $1.4 billion.[3] Another $4.4 billion is spent in support of other non-boat industry businesses, including grocery stores, convenience stores, restaurants, lodging and camping facilities, and gas stations.[4] Nearly 300,000 Californians are employed because of the boating industry or spending related to recreational boating in the state.[5] In total, the boating industry and recreational boating contribute more than $16.5 billion to California's economy each year.[6]

59-A

Moreover, boating contributes substantial dollars in state and local revenues every year. The California Department of Boating and Waterways has estimated that "boating generates as much as $1.6 billion in State and local government revenue annually, with boating-related discretionary revenue impacts estimated at approximately $1.4 billion [87 percent] annually."[7] These revenues are used to fund important state programs ranging from education, public safety, and facilities maintenance.

In addition, much of the revenue generated by boaters from taxes on boat fuel, boat registration fees, and fees paid at state parks is used for environmental programs, such as controlling the spread of aquatic invasive species, marine conservation, and beach restoration. California also receives substantial monies in federal grants for coastal and wetland conservation and sport fish restoration from revenues generated directly by excise taxes paid by boaters on motorboat fuels and fishing tackle, among other fees, under the Wallop-Breaux Aquatic Resources Trust Fund. In Fiscal Year 2003, California received more than $13 million in federal aid in Sport Fish Restoration funds.[8] Also in 2003, California received $1 million in grant monies from the U.S. Fish and Wildlife Service (FWS) for the protection of about 1,800 acres near Point Arena in Mendocino County, including 22 miles of Pacific Ocean coastline, a seven-acre offshore island, a two-mile stretch of the Garcia River, a seabird rookery and several rare coastal habitats, according to the Service.[9] Clearly, regulatory efforts which decrease participation in recreational boating and angling activities will have implications for marine conservation initiatives in the state. 59-A

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[1] Bureau of Land Management, U.S. Department of the Interior, California Coastal National Monument Draft Resource Management Plan / Draft Environmental Impact Statement 3.15-1 (August 2004).

[2] Department of Boating and Waterways, California Resources Agency, California Boating Facilities Needs Assessment. Vol. 5. Boating Economic Assessment and Demand Projections 1-10 (Oct. 15, 2002). This figure represents direct economic output for the boating industry and does not include indirect or induced economic impact. Total economic impact for the boating industry in California is $10.1 billion annually.

[3] National Marine Manufacturers Association, Recreational Boating Statistical Abstract 18 (2004).

[4] Needs Assessment at 1-10.

[5] Needs Assessment at 1-14.

[6] Needs Assessment at 1-14.

[7] Needs Assessment at 1-16.

[8] Press Release, American Sportfishing Association, Senators Lead Bipartisan Effort to Recover Fishing and Boating Investments (Jan. 23, 2004) at http://www.asafishing.org/asa/newsroom/newspr_012304.html.

Stakeholder Involvement

NMMA recognizes and appreciates BLM's efforts to involve a broad array of interested stakeholders in this and future management processes, and the recreational marine industry shares BLM's "broad management vision," which includes "bringing together communities, agencies, organizations, academic institutions, the public and other stakeholders" in order to most effectively—and most equitably—protect the magnificent resources California has to offer.[10] To that end, NMMA strongly encourages the Bureau of Land Management to fully engage the recreational marine manufacturing industry, the recreational boating and fishing communities, and the California Department of Boating and Waterways (DBW). 59-B Specifically, DBW should be identified as a "core managing partner" for the California Coastal National Monument. DBW is not mentioned as a partner or in any other context in the current draft of the management plan.[11] 59-C

The lack of official representation for the recreational boating community and the marine manufacturing industry in the planning process for the CCNM also concerns NMMA. The recreational boating industry and boaters are not included in the Draft Plan's list of partners, although BLM has identified several private, non-governmental groups, such as the Nature Conservancy, Coastal America, the Ocean Conservancy, and several academic institutions.[12] Because recreational boaters constitute a substantial component of the California tourism industry and represent a key user group of waters surrounding the CCNM, NMMA requests that BLM include them in this and future management endeavors. 59-D

The Draft Plan provides a table which indicates that Californians and non-state residents engage in boating, including motor boating, sailing, and personal watercraft use, 21.3 million days each year.[13] According to NMMA and U.S. Coast Guard statistics, 963,379 recreational boats are registered in the state of California, ranking it second for registrations nationwide.[14] Yet it is unclear from the data made available by BLM how frequently recreational boaters venture into the waters adjacent to the protected areas within the CCNM each year. The Draft Plan notes that while "motorized boating in all its forms is a popular activity along the California coast, most of these boaters would not be affected by any management restrictions placed on the rocks or islands due to their tendency to stay well back from the rocks and islands for safety."[15] Although 59-E

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[9] News Release, U.S. Fish and Wildlife Service, Department of Interior, U.S. Fish and Wildlife Service Grants Fund Wetland Conservation Projects in 15 States (Nov. 18, 2002) at http://news.fws.gov/NewsReleases/R9/6770BB4B-2FAF-424B-8DEDFEEAAFC60956.html.

[10] Draft Plan at ED-9.

[11] Draft Plan at Table 2-1.

[12] Draft Plan at 1-11, 1-12, Table 2-1.

[13] Draft Plan, Table 3.15-1.

[14] National Marine Manufacturers Association (2004). This figure does not include documented vessels, which tend to be larger craft, or kayaks and other non-powered craft, which by law do not require registration.

[15] Draft Plan at 4.15-5.

this is reassuring, NMMA believes it would be appropriate to obtain more specific data on recreational boat use patterns within these waters before BLM or state agencies pursue additional regulations or proceed with the Draft Plan. If recreational boaters do not frequent these waters, then it would seem logical that restrictions on access would be unnecessary. On the other hand, if recreational boaters do commonly use these waters, then such access restrictions could have a substantial impact on the public's right to use these resources as well as significant, adverse consequences for California's economy and the recreational marine industry. 59-E

Recreational Boating Access

Recreational boating access, which underpins the viability of the entire marine industry, is a priority for NMMA and its members. NMMA is therefore encouraged by the Draft's conclusion that many "of the regulations needed to manage the resources are already in place" and that the plan neither proposes new regulations nor alters existing management jurisdictions.[16] NMMA appreciates the need to develop a conceptual framework in which sensible management approaches that seek to protect wildlife while balancing the rights of recreational boaters to access public lands and waters can function. Nevertheless, NMMA is concerned about the potential for the development of additional regulations in the future which will be based largely on the conclusions and management recommendations contained in the Draft Plan. 59-F

NMMA believes that the Draft Plan contains language which could translate easily into burdensome and unnecessary regulations that could substantially decrease non-harmful recreational use of the California Coastal National Monument and have significant economic repercussions for the state economy and for local communities along the coast. For example, the Draft Plan acknowledges that its policy statements and impact analyses "will be used to guide BLM in its efforts to interact with its partners and other agencies to achieve the mission of the CCNM."[17] And although the Draft Plan clearly states that "substantial additional regulation is not considered to be necessary," it leaves open the possibility that "targeted new regulation may be necessary where existing regulation is not sufficient to ensure adequate protection of CCNM resources."[18] NMMA is generally cautious of efforts to expand regulatory authority, particularly when alternative approaches can be as effective. It is the view of NMMA that collaboration and partnerships with interested parties, such as recreational boaters, are often far more effective than additional regulations. Outreach and education should always be preferred over regulatory schemes, which can be hindered by a lack of resources and enforcement capability, and which may inadvertently result in pushback from the regulated group. Although the Draft Plan is generally vague with respect to what additional regulations may be necessary in the future, it does outline certain specific measures which it views as potentially appropriate in certain circumstances. 59-G

For example, the Draft Plan suggests that it may be appropriate for federal or state agencies to impose seasonal access restrictions on recreational boating and fishing activities. Under an 59-H

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[16] Draft Plan at ES-3.

[17] Draft Plan at 1-6.

[18] Draft Plan at 2-8.

Alternative A management scenario,[19] the Draft Plan states that an identification of sensitive wildlife resource areas for marine birds and mammals would be followed by actions undertaken by BLM and state agencies with legal jurisdiction to "restrict access on and around the sensitive areas during known nesting and pupping seasons," including boat traffic.[20] Moreover, the Draft Plan indicates that such an identification process—and by consequence boating access restrictions—would be dynamic, meaning that "as new information came to light, site status would change appropriately."[21]

NMMA has two primary concerns with such an approach. First, if it is deemed necessary after such an identification process occurs to impose closures and other access restrictions, BLM and its state partners should undertake a thorough scientific review that shows conclusively that recreational boating is the source of the environmental concern and that less severe measures would be insufficient to protect the marine life in question. NMMA believes an approach guided by sound science[22] that seeks to correct the fundamental environmental issue will prove to be the most effective and efficient way to protect marine mammals and seabirds. 59-H

NMMA's second concern involves the fluidity of this approach. Although NMMA understands that the complexity involved in various ecosystems demands some degree of dynamism on the part of marine managers, we also feel strongly that ad hoc closures and restrictions will result in confusion among the regulated community and lead to enforcement problems associated with noncompliance. Such a fluid approach to management must consider not only ecological factors, but also the regulated community.

The Draft Plan indicates that more should be done to encourage recreation pursuits that "do not disturb wildlife (such as wildlife viewing, photography, and painting)."[23] In Chapter 4, the Draft Plan states that motorized boating "near rocks and islands inhabited by seabirds and marine mammals causes disturbance and stress to those species, and explicitly recommends that state and federal wildlife management agencies should "restrict motorboat use during nesting and pupping seasons" because such restrictions "could reduce the level of stress and disturbance these vehicles cause to wildlife."[24] BLM should clarify what constitutes "disturbance" of wildlife. 59-I Much confusion for both federal regulators and the regulated community has occurred due to agency interpretation of the definition within the Marine Mammal Protection Act (MMPA) of "harassment." Inartful drafting of the Draft Plan could lead a resource manager to conclude wrongly that virtually any activity on the part of a member of the regulated community is a potential harassment or disturbance. Moreover, BLM should fully assess the degree of the

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[19] Draft Plan at 2-49. Here, the Draft Plan states that under an Alternative C (Recreation Opportunity Emphasis) management scenario, implementation decisions to restrict access will occur only during "nesting and pupping seasons for know sensitive wildlife populations—only where known conflicts exist. Activities on the monument would be restricted during this time." Although this is the least restrictive formulation of proposed seasonal access restrictions, NMMA would argue that the points elucidated regarding sound science and public scrutiny should be applied to each of the alternative management scenarios outlined in the Draft Plan.

[20] Draft Plan at 2-24.

[21] Draft Plan at 2-24.

[22] NMMA defines sound science as science which has been conducted by independent experts and has withstood a rigorous peer review process.

[23] Draft Plan at ES-6.

[24] Draft Plan at 4.3-6.

disturbance caused to marine life by boating rather than engage in broad speculation with no scientific basis. Minor disruptions that have no biological effect on species should not result in closing access to otherwise public areas. 59-I

In addition, NMMA is uncertain as to what BLM means by "adjacent lands and waters," and is concerned that the ambiguity will complicate efforts to protect the marine environment and will have the consequence of unnecessarily regulating recreational boaters. It is not clear, for example, how far "adjacent waters" extend from the monument-protected areas. If it is BLM's intention to define "adjacent waters" on a case-by-case basis, then clear guidelines should be established and made available to the public. 59-J

Regulatory Uncertainty

NMMA harbors concerns that the Draft Plan contains a significant degree of uncertainty with respect to potential changes in the regulatory framework, both at the federal and state level, which is a direct concern to industry in California and, indeed, across the United States. For example, the Draft Plan asserts that "management must be adaptive, and the management of the CCNM will occur in the context of changing human and natural conditions. The managing agencies recognize that the plan must be able to adapt to changing circumstances, such as new scientific information, new environmental laws, changing public demands, new management opportunities, or additions of rocks and islands to the CCNM."[25]

A more coherent framework should be developed to guide any significant changes to regulations which stem from the Draft Plan. 59-K For example, guidelines should be developed regarding how decision-makers will notify the public and interested stakeholders of changes; how much notice will be provided; when comment periods will be offered, and for how long; whether public hearings would be appropriate, and when; and whether a regular review schedule of management actions would be appropriate in the event that CCNM managers and state regulatory bodies pursue an "adaptive ecosystem approach." Such a framework should be outlined in the Draft Plan in order to allay concerns that BLM or its partners are seeking to impose severe access restrictions. NMMA recognizes that the Draft Plan stipulates that the "RMP would be evaluated at least once every 4 years to determine the need for significant management modifications or amendments to the plan."[26] Nevertheless, NMMA feels strongly that changes to a previously communicated and publicly vetted plan should be subject to public scrutiny.

Recreational Boating and Angling

The Draft Plan indicates that BLM did not consider regulating sport fishing in coastal waters as a management alternative because "fishing would not occur within the CCNM."[27] But fishing does occur in the waters adjacent to the rocks, islands, and pinnacles protected under the CCNM. 59-L In Chapter 3, for example, the Draft Plan states that many of California's "offshore rocks situated near harbors for launching and mooring boats are popular fishing destinations."[28] As has been mentioned, NMMA is concerned about the lack of clarity regarding "adjacent lands and waters" as well as what constitutes a "disturbance." We believe BLM, prior to proceeding further on a path which could directly or indirectly lead to additional regulations on the recreational angling community, should fully assess the impact of such regulations and more clearly determine the extent to which recreational angling occurs in the waters adjacent to lands protected by the CCNM.

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[25] Draft Plan at 1-13.

[26] Draft Plan at 2-57.

[27] Draft Plan at 2-59.

NMMA must also take issue with the contention that although "fishing does not necessarily cause disturbance, "the proximity of a boat—with its attendant noise and movement—can stress nesting and roosting birds and marine mammals."[29] The Draft Plan provides no documentation of instances when a boat had "disturbed" marine mammals, altered migratory flight patterns, or interfered with the reproductive habits of seabirds or other wildlife. The issue of noise is further discussed below.

59-L

Noise

The Draft Plan says that motorboat traffic "may be very loud" and has the "potential to disturb wildlife."[30] The Draft Plan specifically identifies recreational motorboats and "jet skis" as sources of noise,[31] and later states that it would be prudent for regulators to impose prohibitions on motorboat use during certain times.[32] The plan makes these statements despite having no actual data of motorboat or personal watercraft usage of these resources and certainly no evidence of biologically significant disturbance to wildlife. NMMA takes issue with BLM's claims.

A 2003 study by the Oceans Studies Board of the National Research Council (NRC) characterizes the effect of anthropogenic noise on marine mammals as one of the "least understood subjects" in marine science, further noting that "remarkably few details are known about the characteristics of ocean noise, whether it be of human or natural origin, and much less is understood of the impact of noise on the short- and long-term well-being of marine mammals and the ecosystems on which they depend."[33] Although it is widely assumed and generally agreed upon that noise in fact impacts marine environments, the ability to differentiate between the impacts associated with natural geophysical and biological sounds and those induced by human beings through various ocean activities is very near impossible. Accurate assessments of those impacts at this stage of scientific understanding are infeasible, specifically with respect to recreational boating. According to the NRC, "the contribution from recreational boating to the underwater noise field has not been quantified," particularly with respect to marine mammals.[34]

59-M

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[28] Draft Plan at 3.3-5.
[29] Draft Plan at 3.3-5.
[30] Draft Plan at 4.10-2.
[31] Draft Plan at 3.10-2.
[32] Draft Plan at 4.10-2.
[33] Committee on Potential Impacts of Ambient Noise in the Ocean on Marine Mammals, Ocean Studies Board, National Research Council, Ocean Noise and Marine Mammals 1 (National Academies Press, 2003).
[34] National Research Council at 50.

The recreational boating industry has been well-ahead of the curve on advancing new generation technologies which substantially reduce marine engine noise. For example, the personal watercraft industry has reduced atmospheric radiated noise levels by 70 percent since 1998, according to the Personal Watercraft Industry Association (PWIA), an affiliate of NMMA.[35] Reductions in atmospheric radiated noise levels result in similar reductions in underwater radiated noise levels, according to NRC and PWIA. PWC manufacturers continue their work to make vessels even quieter. The same is true of traditional boat manufacturers, who have reduced engine noise levels substantially due to consumer demand.

Indeed, the NRC is definitive on one point: there is "no documented evidence of ocean noise being the direct physiological agent of marine mammal death *under any circumstance*."[36] NMMA was unable to obtain any documented cases of mortality caused by recreational boat noise in California. It is our contention that until further research is conducted which can definitively assess the impact of recreational boat noise on marine mammals, and until that research is specifically applied to habitat within the areas protected by the California Coastal National Monument, the Draft Plan should not include language that suggests that recreational marine engine noise bears a significant risk of disturbing wildlife. Such language is vulnerable to misinterpretation and lends legitimacy to claims not based in science. Because the Draft Plan will primarily function as a conceptual framework for CCNM management at both the federal and state levels over the long term, and because marine managers will look to the Draft Plan for guidance on management decisions, it should focus on those threats to the marine environment which have been scientifically validated.

59-M

Water Contamination

The report identifies boating as a recreational activity which "may lead to water contamination."[37] Yet the Draft Plan provides little in the way of specific data regarding the extent of potential water contamination associated with recreational boating or the impact such contamination would have on marine life. The Draft Plan does state that the use of motorized boats along the coast "would increase hydrocarbon and ozone precursor emissions from these sources over time, as these uses are expected to increase—corresponding to increased populations and increased public use of the monument."[38] This is misleading, however, because it assumes that boat and engine technology remains static, which is not the case.

59-N

Recreational marine engine manufacturers have made substantial advances in clean engine technologies well ahead of regulatory deadlines. These advances were made by marine engine manufacturers in order to comply with Environmental Protection Agency (EPA) regulations, particularly a 1996 rulemaking that requires marine engine manufacturers to reduce hydrocarbon and NOx exhaust emission for spark-ignition gasoline marine engines by an average 75 percent between 1998 and 2006 on all new outboards and personal watercraft.[39] In addition, regulations imposed by the California Air Resources Board (CARB) have not only accelerated the implementation of the rule nationwide, but have resulted in a new generation of marine engines that exceed the EPA mandated reductions.

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[35] Personal Watercraft Industry Association at http://www.pwia.org/issues/sound.html.
[36] National Research Council at 6. Emphasis added.
[37] Draft Plan at 3.20-1.
[38] Draft Plan at 4.1-3.
[39] Final Rule for New Gasoline Spark-Ignition Marine Engines; 40 C.F.R. Parts 89, 90 & 91.

Although older, two stroke engines are still used by the owners of older watercraft, the population of engines used in recreational vessels is changing dramatically and cleaner four stroke engines and direct injected two stroke engines are rapidly becoming the norm. This change in engine population is important to consider because it substantially reduces the environmental impacts associated with older marine engines. Because of EPA's 1996 Final Rule, the agency expects to achieve the following projected hydrocarbon and NOx reductions nationally: 4 percent in 2000; 26 percent in 2005; 52 percent in 2010; 68 percent in 2015; 73 percent in 2020; and 75 percent in 2050, with the model showing a constant 75 percent reduction in HC and NOx emissions through 2050. Recreational marine manufacturers are exceeding these standards.

Moreover, the number of two stroke engines in use in U.S. waters will inevitably decline due to the lifespan of standard two stroke engines and the public's demand for cleaner, quieter technology. The recreational marine industry is meeting that demand vigorously. Many experts in the recreational marine community have speculated that within a decade, carbureted two stroke marine engines will be largely a thing of the past.

59-N

NMMA also wishes to bring to the attention of BLM a 1994 memorandum drafted by the Environmental Protection Agency entitled, "The Effects of Marine Engine Exhaust Emissions on Water Quality: Summary of Findings of Various Research Studies." EPA evaluated eleven studies that examined the impact of recreational marine engine emissions on marine environments throughout the country, three of which were summaries of a variety of other such studies. After determining that it had captured "the consensus of the literature," EPA concluded, "Based on the studies reviewed for this report, the overall water quality effects of marine engine exhaust gases do not appear to be significant in general."[40]

It should be noted that the most widely-cited studies which show significant levels of pollution employed non-representative methodologies to reach those findings, such as running engines in test tanks for prolonged periods of time. These studies fail to accurately reflect actual marine environments and significantly overestimate the discharge of aqueous hydrocarbon emissions by two stroke marine engines.

In addition to hydrocarbon and NOx emissions, the Draft Plan argues that recreational boating can "contribute to water quality degradation through releases of fuels, oils, and other contaminants," although it does not quantify such degradation.[41] Recreational motor boating does not represent a threat to water quality. NMMA respectfully offers to BLM the following data, much of which is produced by EPA and independent experts, for its consideration and review:

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[40] Memorandum from Jean Marie Revelt, Engine and Vehicle Registration Branch, United States Environmental Protection Agency, to Public Docket No. A-92-38 (Nov. 15, 1994).

[41] Draft Plan at 4.20-5.

- Keuka Lake Water Quality Testing Program (2000) – Results of this test demonstrated via representative environmental testing that no detectable levels of hydrocarbons were found during the most crowded boating areas during holiday weekends.
- Water Test: Donner Lake California (1999) - This study, which was conducted on July 6, traditionally the busiest boating weekend of the year, showed no trace fuel components in the lake.
- Water Test: Anaheim California (1997) – In August 1997, a three-day personal watercraft race was held on an artificial lake in Anaheim, CA. The lake was filled with 14 million gallons of drinking water. In order to use the water, a $250,000 bond was placed to guarantee that the water would be returned unspoiled, and after intense testing which showed no trace of fuel, all the water was returned and the bond money was refunded.[42]

59-N

Recreational marine engine manufacturers worked closely with EPA to establish effective air and water quality standards and have rapidly developed new technology that will reduce hydrocarbon emissions by more than 80 percent. The industry looks forward to working with BLM and its core state partners in a similar way in order to fashion a program of sensible environmental protection for the California Coastal National Monument.

Conclusion

NMMA appreciates the opportunity to provide comment on the Draft California Coastal National Monument Resource Management Plan and Draft Environmental Impact Statement. The recreational marine industry and the American boating public have a long history of sound environmental stewardship and NMMA looks forward to a continued relationship with the Bureau of Land Management regarding this and other issues.

Please do not hesitate to contact Mathew Dunn at (202) 737-9760 or mdunn@nmma.org if you have any questions or need any additional information.

Sincerely,

Monita W. Fontaine

Monita W. Fontaine, Esq.
Vice President, Government Relations

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[42] These and other studies can be viewed at http://www.pwia.org/issues/emissions.html.

(60)

American Sportfishing Association

Leading the Way for Fishing's Future

225 Reinekers Lane, Suite 420
Alexandria, VA 22314
703-519-9691 · FAX: 703-519-1872
www.asafishing.org · info@asafishing.org

Fax Cover Sheet

Date: December 16, 2004
To: California Coastal National Monument
From: Gordon Robertson
Subject: Comments on the Draft RMP/EIS
Number of Pages Including Cover Sheet: 3
Fax Number: 831-647-4244
Message: Attached are comments regarding the CCNM Draft RMP/EIS plan.

Water works wonders
FOR FISHING, BOATING, AND THE ENVIRONMENT

California Coastal National Monument
RMP Response Form

For public input on the Draft California Coastal National Monument Resource Management Plan and Draft Environmental Impact Statement

Note: All items must be completed for form to be accepted Today's Date: December 16, 2004

Your name (please print): Gordon C. Robertson

Representing (put an X in one box only):

☐ Self only
X Business, organization or agency (specify): American Sportfishing Association

Address: 225 Reinekers Lane, Suite 420
City: Alexandria
State: VA Zip: 22314 Phone: 703-519-9691
Email (optional): grobertson@asafishing.org

Important Privacy Notice: Under the Freedom of Information Act, all written comments, including names and street addresses, will be available for public review upon request and may be published by the BLM during the planning process. As an individual, however, you can ask us to withhold your name and address. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety. If you checked "self only" above, and would like us to withhold your name, put an X in this box: ☐

Comments on the California Coastal National Monument Draft RMP/Draft EIS:

The American Sportfishing Association is a non-profit trade association whose 700 members include fishing tackle manufacturers, sport fishing retailers, boat builders, state fish and wildlife agencies, and the outdoor media. After reviewing the draft RMP for the California Coastal National Monument, the American Sportfishing Association (ASA) finds that the plan inadequately addresses the needs of sportfishing. There are two main problems with the draft RMP: 1) recreational fishing regulations or opportunities on the national monument are not clearly defined in the document and 2) the ambiguous nature of the document leaves room for various regulations restricting sportfishing on the coast and within the monument. 60-A

The draft resource management plan fails to discuss sportfishing throughout the entire document. This is very disturbing due to the high economic impact sportfishing has on the state of California each year. Our publication, *Sportfishing in America*, shows 2.4 million anglers in 60-B

California spend more than four billion dollars per year. California's anglers produce the second highest amount of overall economic output, and California's saltwater anglers alone contribute more than 1.7 billion dollars to the state's economy each year. As such a substantial industry for this state, it is appalling that recreational fishing is not even addressed in the draft resource management plan. Another recreational activity that goes hand-in-hand with sportfishing is recreational boating. The only type of boating addressed in this draft RMP is kayaking and sailing. Recreational boating also contributes significantly to California's economy and it would be disappointing if this recreational activity was not included in this plan. We recommend a section be added to each alternative that discusses the opportunities for recreational fishing and boating. 60-B 60-C

Since recreational activities are not addressed, this resource management plan provides avenues for future implementation of regulatory restrictions on recreational fishing and boating. The plan is open to interpretation regarding sportfishing and boating access. In order to support recreational fishing, the opportunities and/or restrictions should be clearly communicated to the public.

The obvious omission of recreational fishing in this plan could lead anglers and boaters to believe that this area is not open to recreational activities such as sportfishing and boating. The opportunities for sportfishing and boating in these public lands should be clearly defined to avoid unnecessary restrictions and to provide the greatest recreational experience to the public. 60-D

Sincerely,

Gordon C. Robertson

Gordon C. Robertson
Vice President

Mail form to: California Coastal National Monument 299 Foam Street Monterey, CA 93940
Or Fax to: (831) 647-4244

Continue your comments on the back of this page, or on additional pages

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(61)

California Coastal National Monument RMP Response Form

For public Input on the Draft California Coastal National Monument Resource Management Plan and Draft Environmental Impact Statement

Note: All items must be completed for form to be accepted

Today's Date: Dec. 16, 2004

Your name (please print): Julie Verran

Representing (put an X in one box only):

☒ Self only

☐ Business, organization or agency (specify):

Address: P.O. Box 382

City: Gualala CA 95445-0382

State: CA Zip: 95445 Phone: (707) 884-3740

Email (optional):

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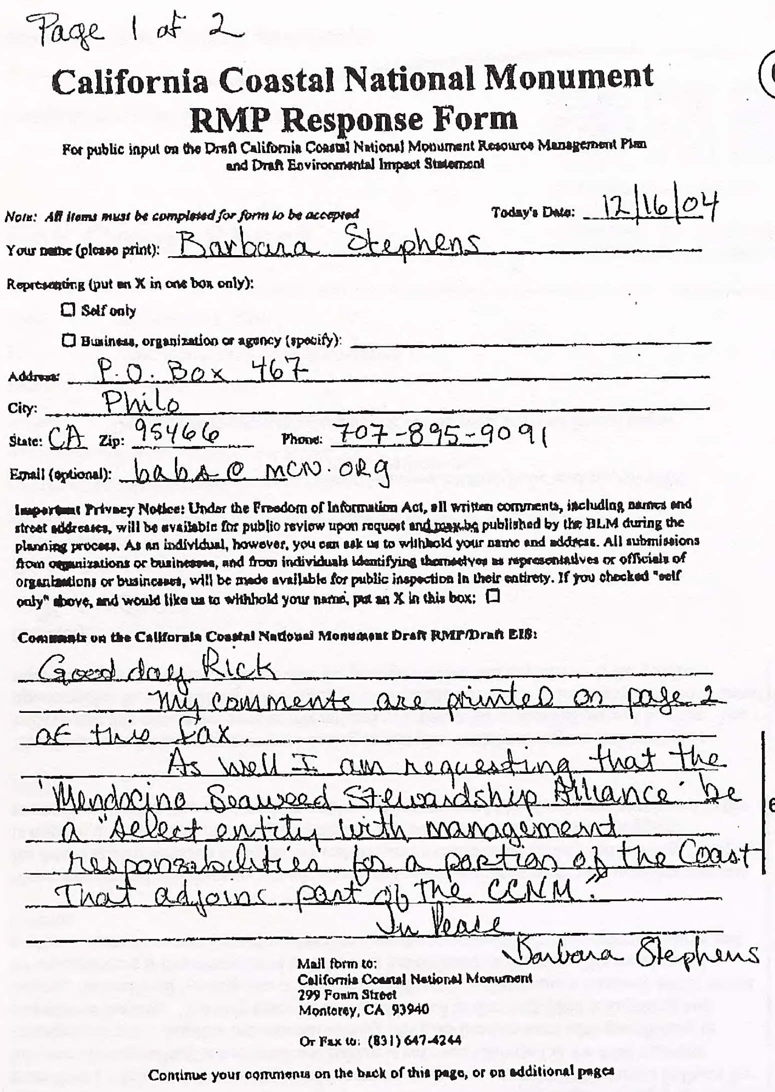
Comments on the California Coastal National Monument Draft RMP/Draft EIS:

Alternative B is the best! The Jones + Stokes EIS, which I have read and marked up, clearly states over and over that Alt. B best protects the environment. Therefore, it best carries out the Proclamation of the Monument. 61-A J+S also list one area of science after another where research is lacking not just seabirds + marine mammals as in Alt. A. 61-B A website like the one for the Carrizo Plain NM would be fine for CCNM 61-C — the coast does not need the commerialism that Alt. A would allow. 61-D

Mail form to:
California Coastal National Monument
299 Foam Street
Monterey, CA 93940

Or Fax to: (831) 647-4244

Continue your comments on the back of this page, or on additional pages



Page 1 of 2

62

California Coastal National Monument
RMP Response Form

For public input on the Draft California Coastal National Monument Resource Management Plan and Draft Environmental Impact Statement

Note: All items must be completed for form to be accepted Today's Date: 12/16/04

Your name (please print): Barbara Stephens

Representing (put an X in one box only):

☐ Self only

☐ Business, organization or agency (specify):

Address: P.O. Box 467
City: Philo
State: CA Zip: 95466 Phone: 707-895-9091
Email (optional): baba @ mcn.org

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Comments on the California Coastal National Monument Draft RMP/Draft EIS:

Good day Rick

My comments are printed on page 2 of this fax.

As well I am requesting that the 'Mendocino Seaweed Stewardship Alliance' be a "select entity with management responsibilities for a portion of the Coast That adjoins part of the CCNM". 62-A

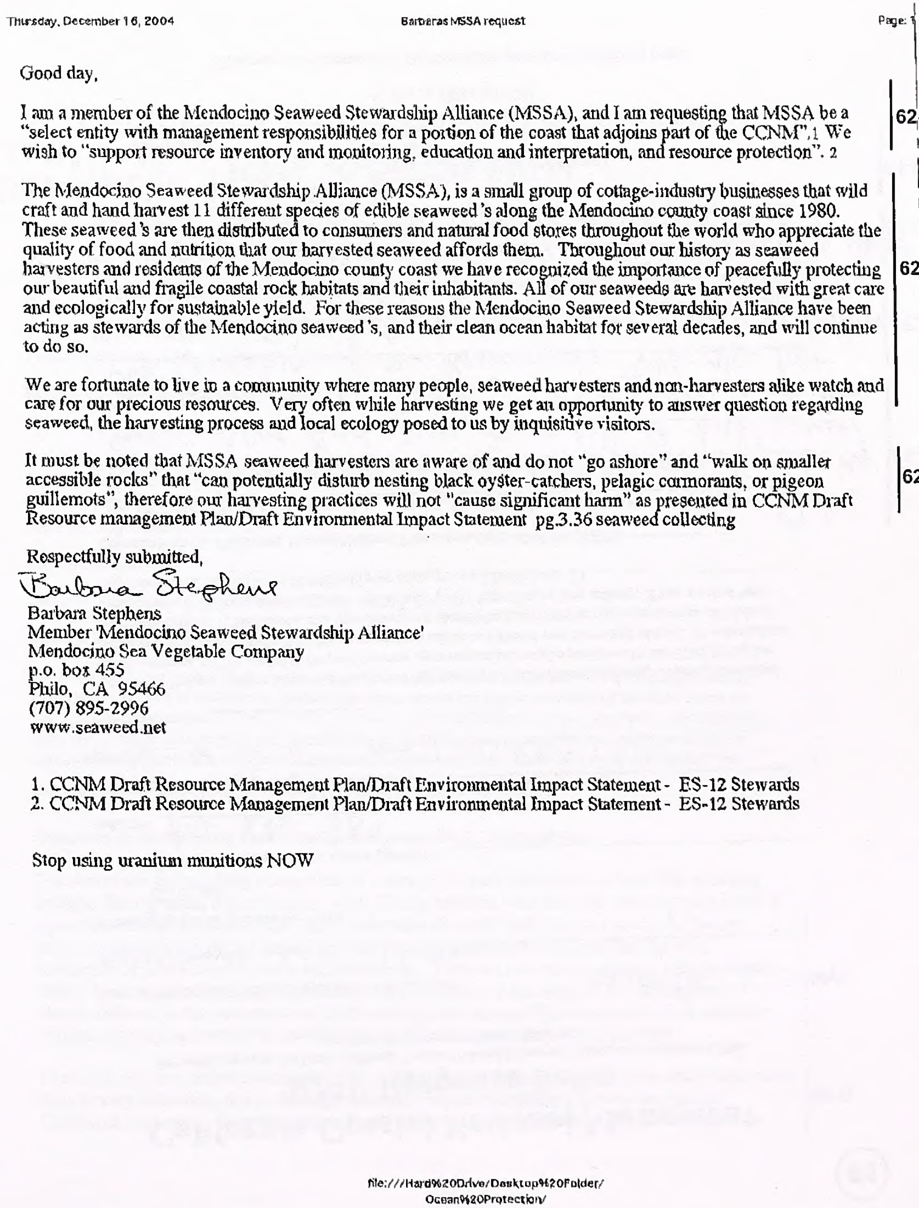
In Peace

Barbara Stephens

Mail form to:
California Coastal National Monument
299 Foam Street
Monterey, CA 93940

Or Fax to: (831) 647-4244

Continue your comments on the back of this page, or on additional pages



Thursday, December 16, 2004 Barbaras MSSA request Page: 1

Good day,

I am a member of the Mendocino Seaweed Stewardship Alliance (MSSA), and I am requesting that MSSA be a "select entity with management responsibilities for a portion of the coast that adjoins part of the CCNM".1 We wish to "support resource inventory and monitoring, education and interpretation, and resource protection". 2 62-A

The Mendocino Seaweed Stewardship Alliance (MSSA), is a small group of cottage-industry businesses that wild craft and hand harvest 11 different species of edible seaweed's along the Mendocino county coast since 1980. These seaweed's are then distributed to consumers and natural food stores throughout the world who appreciate the quality of food and nutrition that our harvested seaweed affords them. Throughout our history as seaweed harvesters and residents of the Mendocino county coast we have recognized the importance of peacefully protecting our beautiful and fragile coastal rock habitats and their inhabitants. All of our seaweeds are harvested with great care and ecologically for sustainable yield. For these reasons the Mendocino Seaweed Stewardship Alliance have been acting as stewards of the Mendocino seaweed's, and their clean ocean habitat for several decades, and will continue to do so. 62-B

We are fortunate to live in a community where many people, seaweed harvesters and non-harvesters alike watch and care for our precious resources. Very often while harvesting we get an opportunity to answer question regarding seaweed, the harvesting process and local ecology posed to us by inquisitive visitors.

It must be noted that MSSA seaweed harvesters are aware of and do not "go ashore" and "walk on smaller accessible rocks" that "can potentially disturb nesting black oyster-catchers, pelagic cormorants, or pigeon guillemots", therefore our harvesting practices will not "cause significant harm" as presented in CCNM Draft Resource management Plan/Draft Environmental Impact Statement pg.3.36 seaweed collecting 62-C

Respectfully submitted,

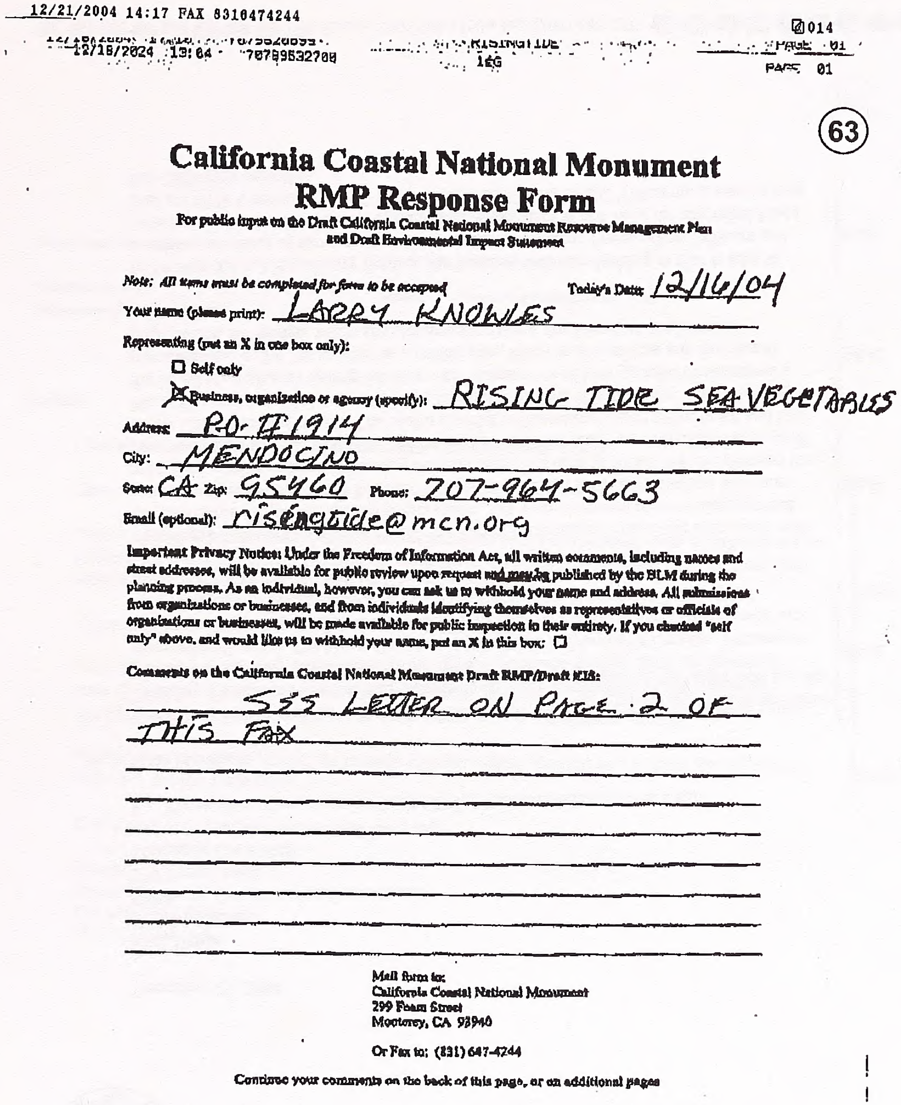
Barbara Stephens

Barbara Stephens
Member 'Mendocino Seaweed Stewardship Alliance'
Mendocino Sea Vegetable Company
p.o. box 455
Philo, CA 95466
(707) 895-2996
www.seaweed.net

1. CCNM Draft Resource Management Plan/Draft Environmental Impact Statement - ES-12 Stewards
2. CCNM Draft Resource Management Plan/Draft Environmental Impact Statement - ES-12 Stewards

Stop using uranium munitions NOW

file:///Hard%20Drive/Desktop%20Folder/Ocean%20Protection/



12/21/2004 14:17 FAX 8316474244 ☒014

12/16/2024 13:04 7078953270 RISINGTIDE PAGE 01

PAGE 01

63

California Coastal National Monument RMP Response Form

For public input on the Draft California Coastal National Monument Resource Management Plan and Draft Environmental Impact Statement

Note: All items must be completed for form to be accepted Today's Date: 12/16/04

Your name (please print): LARRY KNOWLES

Representing (put an X in one box only):

☐ Self only

☒ Business, organization or agency (specify): RISING TIDE SEA VEGETABLES

Address: P.O. #1914

City: MENDOCINO

State: CA Zip: 95460 Phone: 207-964-5663

Email (optional): risingtide@mcn.org

Important Privacy Notice: Under the Freedom of Information Act, all written comments, including names and street addresses, will be available for public review upon request and may be published by the BLM during the planning process. As an individual, however, you can ask us to withhold your name and address. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety. If you checked "self only" above, and would like us to withhold your name, put an X in this box: ☐

Comments on the California Coastal National Monument Draft RMP/Draft EIS:

SEE LETTER ON PAGE 2 OF THIS FAX

Mail form to:
California Coastal National Monument
299 Foam Street
Monterey, CA 93940

Or Fax to: (831) 647-4244

Continue your comments on the back of this page, or on additional pages

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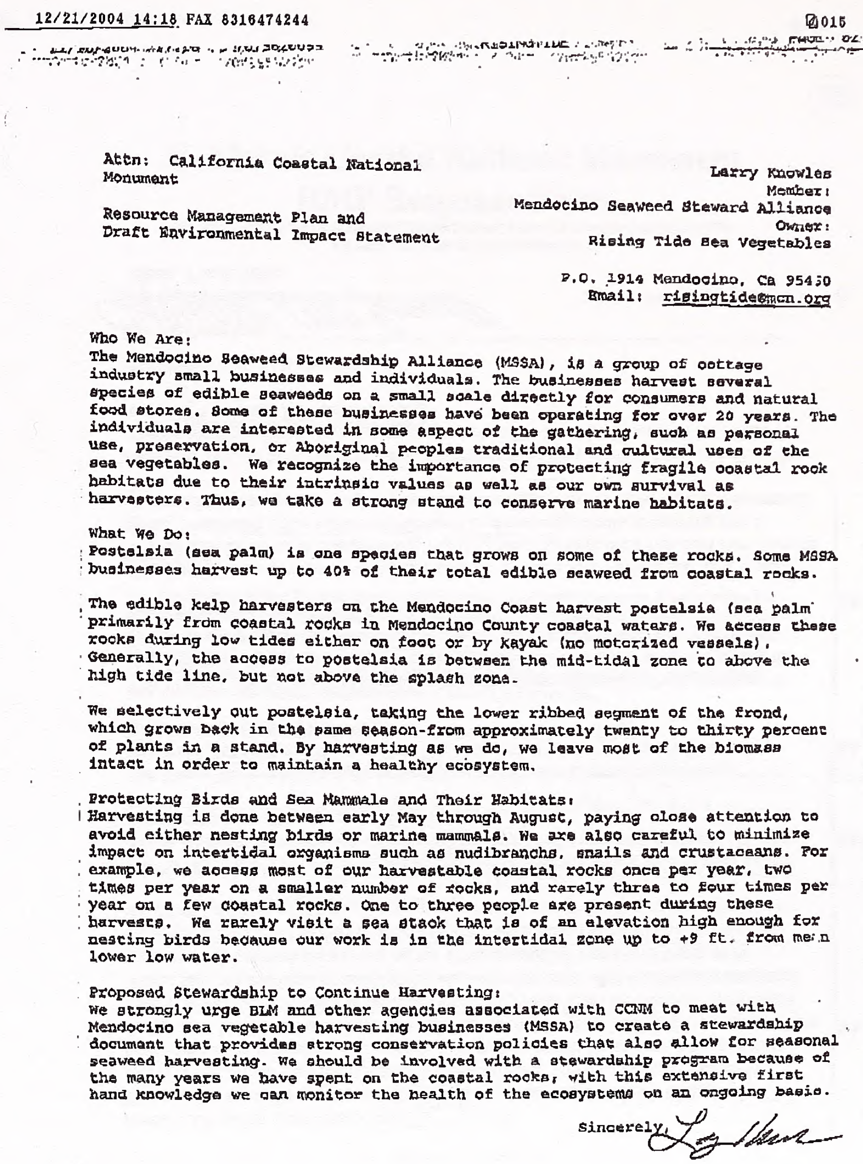


12/21/2004 14:18 FAX 8316474244 ☒015

Attn: California Coastal National Monument

Resource Management Plan and
Draft Environmental Impact Statement

Larry Knowles
Member:
Mendocino Seaweed Steward Alliance
Owner:
Rising Tide Sea Vegetables

P.O. 1914 Mendocino, Ca 95450
Email: risingtide@mcn.org

Who We Are:
The Mendocino Seaweed Stewardship Alliance (MSSA), is a group of cottage industry small businesses and individuals. The businesses harvest several species of edible seaweeds on a small scale directly for consumers and natural food stores. Some of these businesses have been operating for over 20 years. The individuals are interested in some aspect of the gathering, such as personal use, preservation, or Aboriginal peoples traditional and cultural uses of the sea vegetables. We recognize the importance of protecting fragile coastal rock habitats due to their intrinsic values as well as our own survival as harvesters. Thus, we take a strong stand to conserve marine habitats.

What We Do:
Postelsia (sea palm) is one species that grows on some of these rocks. Some MSSA businesses harvest up to 40% of their total edible seaweed from coastal rocks.

The edible kelp harvesters on the Mendocino Coast harvest postelsia (sea palm primarily from coastal rocks in Mendocino County coastal waters. We access these rocks during low tides either on foot or by kayak (no motorized vessels). Generally, the access to postelsia is between the mid-tidal zone to above the high tide line, but not above the splash zone.

We selectively cut postelsia, taking the lower ribbed segment of the frond, which grows back in the same season-from approximately twenty to thirty percent of plants in a stand. By harvesting as we do, we leave most of the biomass intact in order to maintain a healthy ecosystem. 63-A

Protecting Birds and Sea Mammals and Their Habitats:
Harvesting is done between early May through August, paying close attention to avoid either nesting birds or marine mammals. We are also careful to minimize impact on intertidal organisms such as nudibranchs, snails and crustaceans. For example, we access most of our harvestable coastal rocks once per year, two times per year on a smaller number of rocks, and rarely three to four times per year on a few coastal rocks. One to three people are present during these harvests. We rarely visit a sea stack that is of an elevation high enough for nesting birds because our work is in the intertidal zone up to +9 ft. from mean lower low water.

Proposed Stewardship to Continue Harvesting:
We strongly urge BLM and other agencies associated with CCNM to meet with Mendocino sea vegetable harvesting businesses (MSSA) to create a stewardship document that provides strong conservation policies that also allow for seasonal seaweed harvesting. We should be involved with a stewardship program because of the many years we have spent on the coastal rocks, with this extensive first hand knowledge we can monitor the health of the ecosystems on an ongoing basis. 63-B

Sincerely,

(64)

YUROK TRIBE
190 Klamath Boulevard • Post Office Box 1027 • Klamath, CA 95548

December 29, 2004

Rick Hanks
CCNM Manager
California Coastal national monument
299 Foam Street
Monterey, CA 93940

Re: Yurok Tribe Comments on Draft CCNM Resource Management Plan

Dear Mr. Hanks,

The Yurok Tribe provided comments at the October 2004 BLM scoping meeting held in Trinidad. This letter reiterates and elaborates on those comments. Yurok Ancestral Territory is partially represented by 50 miles of coastline running from the mouth of Damnation Creek in Del Norte County to Little River in Humboldt County. Numerous offshore rocks are important to the Yurok Tribe and its lifeways. All offshore rocks are named, figure in Yurok legends, provide the substrate of subsistence hunting and gathering resources, and are significant in various religious ceremonies. **64-A**

The Yurok Tribe also operates the North Coastal Information Center per a contract with the California Office of Historic preservation. We were involved in providing cultural resources data to your office in 2001. We also conducted some consultation with our neighboring tribes prior to releasing cultural resources data to BLM. We are alarmed that your draft plan at Section 3.4.3.2 only indicates that four sites were identified as a result of the CHRIS record search. The North Coastal Information Center (Humboldt and Del Norte County) provided at least 20 site locations. **64-B** Further it is not clear what advantage the BLM is gaining by listing the four sites. Regardless of how popular or unknown a particular site is; by listing sites in a public plan, BLM is not gaining any functional information advantage, while simultaneously risking disclosure of confidential information. **64-C**

In Section 3.4.3.3 Regulatory Setting, the Federal section is lacking in that it fails to mention the status of some coastal tribes as Tribal Historic Preservation Officers and avoids the fact that the BLM Programmatic Agreement is not valid for any tribal lands that are NHPA section 101(d)2 tribes. Three California THPO Tribes are located along the California coastline. **64-D**

Section 3.8 Indian Trust Resources
This section would be greatly enhanced with a more in-depth analysis of the Indian Tribal federal government trust relationship. Specifically any Tribal right, not specifically negotiated away is retained by the tribe. This section would be improved by identifying the specific historic relationships that exist between the tribes listed in this section and the federal government in order to correctly ascertain Indian Trust Resources. For example Yurok pick seaweed and mussels off of some coastal rocks. This traditional subsistence right was not negotiated away during the 1850 un-ratified Yurok-U.S treaty or in subsequent Executive Orders establishing the Yurok Reservation and recognizing the Yurok as a distinct nation. **64-E**

The Yurok Tribe is interested in further analysis of any monument sites located within Yurok Ancestral territory that will be used onshore for the purposes of staging, interpretation, or other administrative functions. **64-F**

The Yurok Tribe requests that any land acquisition plans to purchase additional monument lands or easements within Yurok ancestral territory be conducted in close consultation with the Yurok Tribe. **64-G**

The Yurok Tribe wishes to contract/compact any environmental, cultural resources or interpretive studies proposed for areas along the Yurok coastline that are necessary for further developing or implementing this draft plan. In addition the Yurok Tribe is developing its capacity to perform cadastral survey functions.

The Yurok Tribe is currently contemplating the creation of a Yurok tribal park system. We are also involved in documenting Yurok coastal lifeways per a National Park Service grant. The Yurok Tribe would be interested in discussing details of entering into a stewardship or cooperating agency status relationship with the BLM Coastal Monument. **64-H**

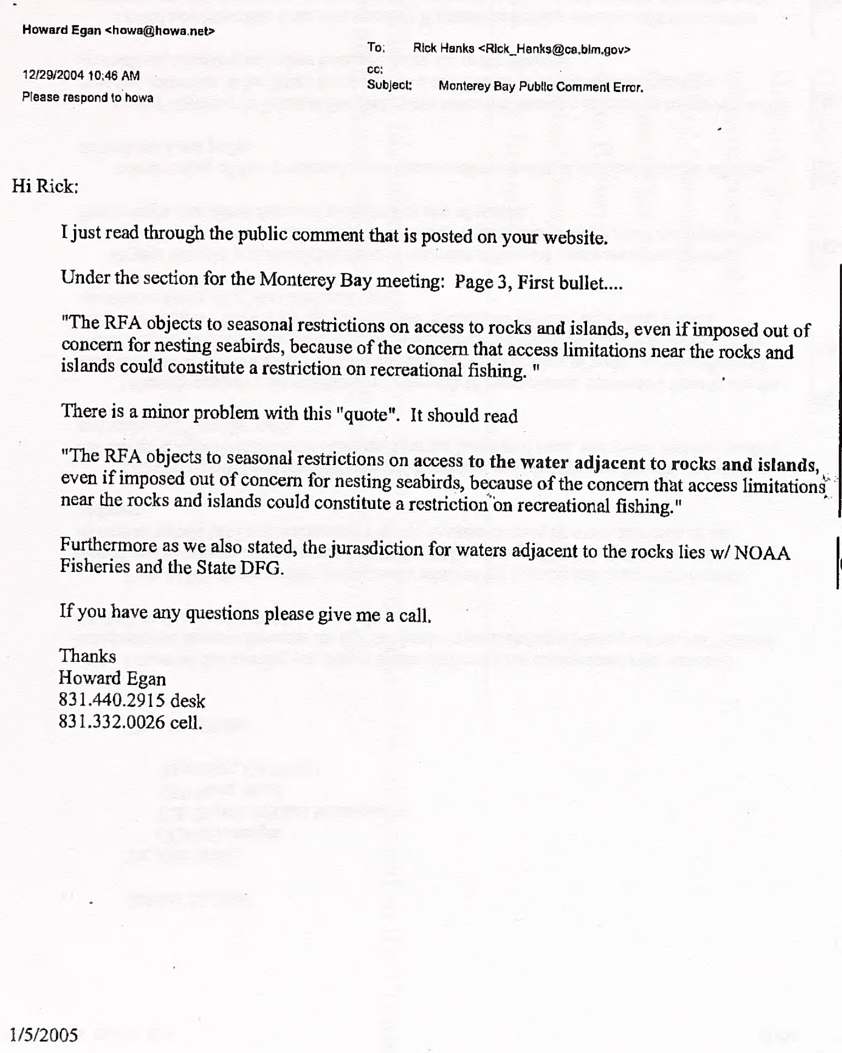
We look forward to discussing the draft Management Plan in more detail in a direct face-to-face meeting. Please do not hesitate to contact Dr. Thomas Gates (707 482 1822)of our staff to arrange for such a meeting.

Sincerely,

Howard Mc Connell
Howard McConnell
Chair, Yurok Tribe

Phone: (707) 482-1350 • Fax: (707) 482-1377

65



Howard Egan <howa@howa.net>

12/29/2004 10:46 AM
Please respond to howa

To: Rick Hanks <Rick_Hanks@ca.blm.gov>
cc:
Subject: Monterey Bay Public Comment Error.

Hi Rick:

I just read through the public comment that is posted on your website.

Under the section for the Monterey Bay meeting: Page 3, First bullet....

"The RFA objects to seasonal restrictions on access to rocks and islands, even if imposed out of concern for nesting seabirds, because of the concern that access limitations near the rocks and islands could constitute a restriction on recreational fishing. "

There is a minor problem with this "quote". It should read

"The RFA objects to seasonal restrictions on access **to the water adjacent to rocks and islands**, even if imposed out of concern for nesting seabirds, because of the concern that access limitations near the rocks and islands could constitute a restriction on recreational fishing."

65-A

Furthermore as we also stated, the jurasdiction for waters adjacent to the rocks lies w/ NOAA Fisheries and the State DFG.

65-B

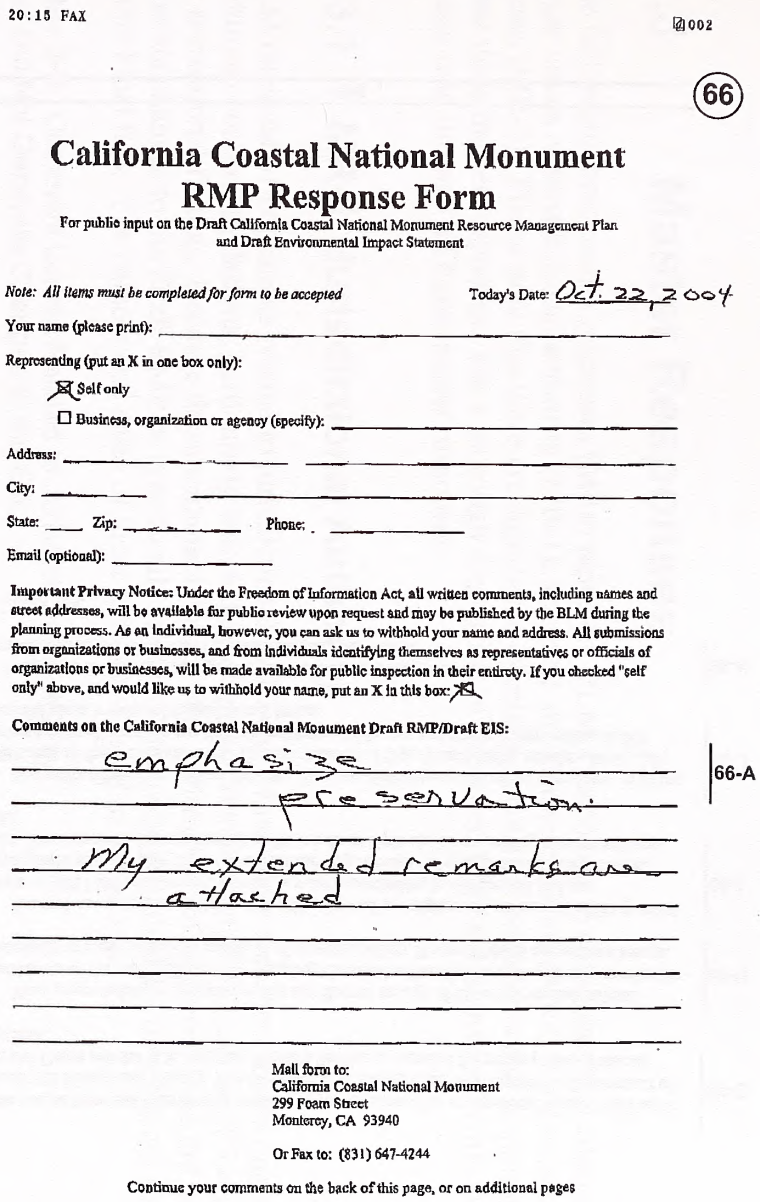
If you have any questions please give me a call.

Thanks
Howard Egan
831.440.2915 desk
831.332.0026 cell.

1/5/2005

03/03/2005 20:15 FAX ☑002

66



California Coastal National Monument
RMP Response Form

For public input on the Draft California Coastal National Monument Resource Management Plan and Draft Environmental Impact Statement

Note: All items must be completed for form to be accepted Today's Date: Oct. 22, 2004

Your name (please print): ______

Representing (put an X in one box only):

☒ Self only

☐ Business, organization or agency (specify): ______

Address: ______

City: ______

State: ___ Zip: ______ Phone: ______

Email (optional): ______

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Comments on the California Coastal National Monument Draft RMP/Draft EIS:

emphasize preservation.

My extended remarks are attached

66-A

Mail form to:
California Coastal National Monument
299 Foam Street
Monterey, CA 93940

Or Fax to: (831) 647-4244

Continue your comments on the back of this page, or on additional pages

October 22, 2004

To: Rick Hanks
CCNM Manager
U.S. Bureau of Land Management
299 Foam Street
Monterey, CA 93940

Dear Mr. Hanks:

I attended the meeting you hosted on the draft resource management plan and draft environmental impact statement for the California Coastal National Monument held in Trinidad city hall on October 21, 2004.

I would like to personally apologize for some of the remarks and comments directed toward you personally by some members of the audience, especially some fishermen. I am not a fishermen myself but I was embarrassed by the comments made by some members of the audience.

I live in Trinidad and have experienced happiness each day for four decades as I witness the changing light over the rocks offshore, hear the barking of seals, and watch seabirds landing and taking off from the rocks.

66-B I strongly support your collaborative approach to management. 66-C However I want to see the final EIS address more strongly the fact that an ecosystem consists of water and shoreline and rocks. I agree that more scientific research is desirable concerning geology and biology of the rocks but I believe there is enough information to establish the need for federal marine sanctuaries along all of the California coast.

66-D In your remarks you stated that most of the rocks offshore do not have trees, however, several rocks offshore near Trinidad have stands of trees and these large rocks need protection from people who climb them and start fires or acts of vandal.

66-E Interpretation of this monument is best done onshore mostly at existing facilities of state, federal and local parks.

66-F I enjoy kayaking in Trinidad Bay but I have witnessed increase in summer recreation in this area and sometime in the future there may be a need for more education and regulation of recreational kayaking and other boating around the rocks offshore.

66-G I could not determine from your remarks if mussel collecting would continue under the management plan for the monument. I don't personally collect or eat mussels. However with increasing population in the local area I see the possibility of over harvesting of mussels in the future just as there has been over harvesting of sea anemones for commercial sales on tidal areas of rocks off Mendocino County. Your collaborative management with California Department of Fish and Game and the U.S. Fish and Wildlife Service is essential for preservation of marine resources.

66-H Your presentation, in my opinion, did not discuss enough of the religious and cultural significance of the rocks offshore. By lumping historical with religious and cultural you miss the opportunity to explore Buddha nature in all sentient beings. Rocks offshore are sentient beings.

66-I Ecosystems means interrelated. Scientifically and in religion that means one of the greatest threats, which I did not hear you discuss in your presentation, is offshore oil and gas development and oil spills from oil tankers moving through the waters surrounding offshore rocks. You know the damage that oil spills can do to birds and their roosting sites on offshore rocks.

66-J The rocks offshore as well as Trinidad Head are defining aspects of the experience of living in this area of the California coast. The interrelation of fog, storms, rocks, beaches, birds, fish, marine mammals confirm our lives as residents of this area and attract many visitors to this beautiful place we are privileged to call home.

66-K I urge you to adopt a management plan that focuses on preservation, protection, and appreciation of the California Coastal National Monument.

Thank you,

3.3 Master Responses

The following three master responses (MRs) represent BLM's responses to comments that addressed the larger issues of jurisdictional authority (MR-1), sensitive site characterization (MR-2), and recreational access (MR-3). Please note that there are significant overlaps in both the comments and responses among these three master responses. For a thorough discussion of Proposed RMP revisions and implications, please read through all three master responses.

3.3.1 MR-1, Jurisdictional Authority

BLM received 61 comments related to jurisdictional authority. Nine of the comment letters opposed additional coastal regulations, particularly where they might overlap existing DFG and NMFS regulations for recreational fishing. Because these comment letters were expressions of preference and did not generate changes to the Draft RMP or specifically relate to the analysis in the EIS, they are not reprinted in this Final EIS. The authors and dates of these letters are listed in Table 3-2.

Table 3-2. Comment Letters Related to Jurisdictional Authority
That Did Not Generate Changes to the EIS

Date	Author
October 11, 2004	John Perez
October 14, 2004	Gregor M. Cailliet
October 14, 2004	Howard Egan
October 22, 2004	Identification Withheld
October 27, 2004	John L. Campbell
October 28, 2004	Michael Taix
November 10, 2004	Alvin Brown
November 10, 2004	Michelle Innis
November 20, 2004	Gary Borgnino

The remaining 52 comments identified more specific issues and concerns to be addressed in the Proposed RMP/Final EIS. The authors and dates of these letters are listed in Table 3-3.

Table 3-3. Comment Letters Related to Jurisdictional Authority That Generated Changes to the EIS

Comment Identification Number	Author
2-B	James A. Springer
5-D	Louise Mariana
6-A	Recreational Fishing Alliance (RFA)
6-D	RFA
6-E	RFA
6-H	RFA
6-O	RFA
8-C	Howard Egan, RFA
12-F	Mark Cortright
15-B	Kit Mann, Kokatat Water Sportswear
15-D	Kit Mann, Kokatat Water Sportswear
15-F	Kit Mann, Kokatat Water Sportswear
18-C	Cliff Hart
29-B	Michael J. Zamboni
32-D	Carl B. Lind
33-G	Ed Almanza, Ocean Laguna Foundation
34-C	Glenn Stockwell
38-A	Surfrider Foundation
39-C	Natural Resources Defense Council
39-D	Natural Resources Defense Council
42-F	Sonoma County Abalone Network
43-C	California Coastal Commission
47-B	NOAA National Marine Fisheries Service (NMFS)
47-D	NMFS
47-J	NMFS
47-N	NMFS
47-T	NMFS
47-V	NMFS
47-W	NMFS
47-CC	NMFS
48-C	U.S. Navy
48-D	U.S. Navy
48-H	U.S. Navy
48-I	U.S. Navy
48-V	U.S. Navy

Table 3-3. Comment Letters Related to Jurisdictional Authority That Generated Changes to the EIS (continued)

Comment Identification Number	Author
48-W	U.S. Navy
48-HH	U.S. Navy
48-JJ	U.S. Navy
48-SS	U.S. Navy
48-TT	U.S. Navy
48-AAA	U.S. Navy
48-EEE	U.S. Navy
49-B	John J. Lewallen, Mendocino Seaweed Stewardship Alliance
53-A	U.S. Minerals Management Service
57-B	Sierra Club, Coastal Programs
59-C	National Marine Manufacturers Association
59-D	National Marine Manufacturers Association
59-J	National Marine Manufacturers Association
62-A	Barbara Stephens, Mendocino Sea Vegetable Company
63-B	Larry Knowles, Rising Tide Sea Vegetables
64-H	Yurok Tribe
65-B	Howard Egan, RFA

Substantive comments on jurisdictional authority addressed concerns relating to BLM's jurisdictional authority, collaboration and partnerships, mapping of CCNM lands, seasonal restrictions, and coordination of research activities. The bulleted lists below describe public comments in more detail, followed by BLM's responses to these concerns.

Jurisdictional Authority

Commenters expressed the following concerns:

- Proposed management actions extend outside BLM jurisdiction, which is limited to rocks and islands above mean high tide (i.e., not including surrounding waters, airspace, and mainland areas).
- Clarify BLM's management jurisdiction (i.e., physical vs. biological resources) and the authorities of other agencies regarding associated resources.
- Clarify that management actions do not extend to boat, surfboard, and kayak fishing in surrounding waters.
- Overlap with existing regulations per DFG, California Fish and Game Commission (CFGC), FWS, and NMFS for water-based activities and/or marine wildlife is a concern.

- Identify the jurisdictional agency for intertidal species and habitat found below mean high tide.
- Clarify the exemption for all DoD activities in the land, water, or air space near CCNM lands.
- BLM lacks regulatory authority to pose restrictions on low-flying aircraft (FAA jurisdiction).
- Adequate management of CCNM lands is already provided by the federal California Rocks and Islands Wildlife Sanctuary, state Offshore Rocks and Pinnacles Ecological Reserve (per MOU), DFG, and Title 14 of the California Code of Regulations.

As stated in Presidential Proclamation No. 7264, the CCNM comprises "all unappropriated or unreserved lands and interest in the lands owned or controlled by the United States in the form of islands, rocks, exposed reefs, and pinnacles above mean high tide within 12 nautical miles of the shoreline of the State of California." To clarify the legal boundaries of BLM management, a new subsection has been added to Chapter 1 in the RMP (Section 1.3.2, "Management Boundaries"). This new section explicitly states that "BLM has jurisdiction over activities and resources on monument lands only. Activities in waters surrounding monument lands are regulated by core-managing partners and/or other agencies with appropriate jurisdiction." This new section contains matrices (Tables 1-1a and 1-1b) that clarify the respective jurisdictions of BLM, DFG, DPR, FWS, NMFS, MMS, SLC, California Coastal Commission, USCG, FAA, and others through a listing of potential activities on and adjacent to the monument. A description of BLM's role in management of resources that reside in multiple jurisdictions (e.g., intertidal resources) is provided, as well as reference to existing regulatory processes in place to address the potential activities.

The text of the RMP has been reviewed and edited to ensure that BLM's jurisdiction is clear. For example, management actions for recreational activities in the Proposed RMP (Section 2.2.3, under "Recreation") have been revised to clarify BLM's jurisdiction over activities occurring on monument lands only.

It is important to note that "a number of the larger offshore features are appropriated for other uses and are not part of the CCNM" (Section 1.3, "Planning Area and Map"). Section 3.9, "Land Use/Lands and Realty," in the Draft RMP/Draft EIS includes a table of islands not included in the CCNM (see Table 3.9-1). Some of these lands are under ownership and management of the DoD, including San Clemente, San Miguel, and San Nicolas Islands. Although these islands are not part of the CCNM, there are unappropriated or unreserved rocks, islands, and pinnacles adjacent to or in the vicinity of these islands that are under BLM jurisdiction. Nothing in this RMP expressly or implicitly precludes, restricts, or requires modification of current or future authorized uses of the lands, waters, or airspace adjacent to the CCNM by the DoD or the USCG, or their agents, allies, military range and test facility base users, or range service providers.

The RMP (Section 1.8, "Existing Designations") notes that some monument lands are already provided some additional protection attention by DFG as the State of California's Offshore Rocks and Pinnacles Ecological Reserve. BLM will work collaboratively with DFG as a core-managing partner to effectively manage monument resources. Areas of overlapping jurisdiction will continue to be managed by DFG according to federal and state mandates.

Finally, the discussion of applicable regulations (Section 1.5.2, "Criteria Established by Other Legislative Constraints") has been expanded to include relevant state regulations. Revisions and corrections to the Proposed RMP are contained in Chapters 1 and 2; revisions and corrections to the EIS are located in Chapter 4 of this document.

Collaboration and Partnerships

Commenters expressed the following concerns:

- Identify FWS, NMFS, and California Department of Boating and Waterways as active managing/collaborative partners.
- Identify the RFA, Ocean Laguna Foundation, Mendocino Seaweed Stewardship Alliance, and Yurok Tribe as stewards/collaborative partners.
- The plan needs to support coordination and collaboration with other agencies and organizations, particularly those with jurisdiction over water-based activities and/or marine wildlife.
- There is a need for detailed assessment of staffing and budget resources with core-managing partners to determine management gaps that BLM can fill.
- It was suggested that BLM adopt MOUs/MOAs with collaborating partners to obtain permission to enforce regulations directly affecting CCNM resources.
- Concern was expressed regarding collaboration with private entities with a commercial profit-making focus.

The discussions of collaborative partners in the RMP (Section 1.6, "Planning Process," and Section 2.3.2, "Partnerships—Collaboration Focus") have been expanded to include additional agencies and organizations that have requested inclusion in the process. FWS and NMFS are important collaborating partners with jurisdiction over activities and resources on and adjacent to the monument (see discussion of BLM's jurisdictional authority above). BLM welcomes the opportunity for coordination and collaboration with other organizations, including the RFA, Ocean Laguna Foundation, and Mendocino Seaweed Stewardship Alliance in protecting the monument's important resources and undertaking stewardship activities. Nation to nation consultation with the Yurok Tribe will be conducted as well. Collaboration with private entities will be undertaken, to the extent that these entities can assist in management of the CCNM within the framework of the larger coastal ecosystem, or where management actions affect private activities and/or programs; however, no special provisions will be allowed in support of profit-making. Revisions and corrections to the Proposed RMP are located in Chapter 2 of this document.

BLM, DFG, and DPR will work collaboratively as core-managing partners to manage the biological, geologic, cultural, and visual resources of the monument. However, all staffing and budget resources decisions will be made individually by each government agency.

Mapping of CCNM Lands

Commenters expressed the following concerns:

- The nearshore ocean zone should be represented—rather than rocks, pinnacles, and islands only—in plan maps and text.

- Clarify the CCNM boundaries regarding San Clemente, San Nicolas, and San Miguel Islands.

As clarified in Chapter 1 of the RMP (Section 1.3.1, "Planning Area and Map"), three categories have been developed to more accurately describe the CCNM: (1) the CCNM, which includes all unappropriated or unreserved lands owned or controlled by the United States in the form of islands, rocks, exposed reefs, and pinnacles above mean high tide within 12 nautical miles of the shoreline of California; (2) the CCNM corridor, which is the 12-nautical-mile area in which the rocks and islands that make up the monument are found; and (3) the CCNM planning area, which comprises the Coastal Zone, as defined by the California Coastal Commission, and the CCNM corridor—where BLM will conduct planning activities for the CCNM.

A number of the larger offshore features are appropriated for other uses and are not part of the CCNM. Section 3.9, "Land Use/Lands and Realty," in the Draft RMP/Draft EIS includes a table of islands not included in the CCNM (see Table 3.9-1). Some of these lands are under ownership and management of the DoD, including San Clemente, San Miguel, and San Nicolas Islands.

Seasonal Restrictions

Commenters expressed the following concern:

- Clarify that seasonal restrictions apply only to monument lands.

The discussions of seasonal restrictions (Section 2.2.2, under "Wildlife Resources") and allowable recreational activities (Section 2.2.2, under "Recreation") in the RMP have been revised to address human access on monument lands only. In addition, a footnote has been added to Figure 1-1b, which illustrates the CCNM Planning Area, to clarify that only rocks and islands above mean high tide—not the entire nearshore ocean zone—are under BLM management. Please see also MR-2, Sensitive Site Characterization.

Coordination of Research Activities

Commenters expressed the following concern:

- Clarify BLM's management role in coordinating research activities.

As stated in the RMP (Section 2.2.2, under "Research"), BLM will take an active role in promoting and coordinating research along the California coast, especially as it relates to a better understanding of the coastal resources under its stewardship and their relationship to human activity. BLM will work with collaborative partners, marine research institutions and laboratories, marine aquariums and museums, and other non-profit organizations in an attempt to focus research to achieve these ends through the permitting process. In addition, BLM may conduct research itself where funding is available.

3.3.2 MR-2, Sensitive Site Characterization

Seventeen comments addressed the characterization of sensitive sites in BLM's planned resource inventory. Table 3-4 lists the authors and dates of letters that related to characterization of sensitive sites. A discussion in response to all comments follows below.

Table 3-4. Comment Letters Related to Characterization of Sensitive Sites

Comment Identification Number	Author
6-J	Recreational Fishing Alliance (RFA)
6-L	RFA
6-M	RFA
6-N	RFA
6-P	RFA
6-R	RFA
6-S	RFA
12-G	Mark Cortright
33-C	Ed Almanza, Ocean Laguna Foundation
33-E	Ed Almanza, Ocean Laguna Foundation
42-G	Sonoma County Abalone Network
44-B	Mendocino Coast Audubon Society
46-B	NOAA Monterey Bay National Marine Sanctuary
46-G	NOAA Monterey Bay National Marine Sanctuary
47-FF	NOAA National Marine Fisheries Service
57-R	Sierra Club, Coastal Programs
59-H	National Marine Manufacturers Association

Substantive comments on sensitive site characterization addressed concerns relating to definition of sensitive sites, timing of site characterization, seasonal restrictions, enforcement, and resource inventory. The bulleted lists below describe public comments in more detail, followed by BLM's responses to these concerns.

Definition of Sensitive Sites

Commenters expressed the following concerns:

- Characterization of sensitive seabird and mammal sites should be undertaken, as it will lead to a knowledge base with which to make informed and effective decisions.
- The definition of sensitive sites should be based on regulatory criteria (i.e., listing as endangered or threatened) vs. subjective determinations by resource specialists.
- Identification of sensitive wildlife resource areas should be based on thorough scientific review (if it shows recreational boating as a concern).
- Clarify what is included in BLM sensitive species and/or CNPS rare species.

The Proposed RMP (Section 2.3.3, "Plan Implementation Priorities" of this document) identifies a site characterization study as a pivotal first-step in BLM management. This comprehensive site characterization will be critical to identifying the resources that comprise the CCNM as well as the important locations, resources, and values that the monument aims to protect. It also will enable BLM to organize research and monitoring needs, gaps, and opportunities; discuss the CCNM in terms of its physical, biological, and cultural dimensions; begin developing the CCNM's public education and interpretive initiatives; and establish a public, accessible, web-based site.

The CCNM was established primarily to protect the geologic formations that provide habitat for plants and animals, including seabirds and marine mammals. In this context, a prioritizing mechanism will be developed to identify sites in need of management attention. Appendix D of this document provides a preliminary list of known sites of seabird and marine mammal use. This list will be used as a starting point and refined to identify sites requiring further management action. Prior to implementing any site-specific management action, additional information will be gathered, such as data regarding the site's value as habitat and the existence of known conflicts related to use of the site. Where important sites are identified as being threatened by current conditions, management actions will be prioritized to prevent loss of resources.

The EIS has been revised (see Section 4.3.2.2, "Special-Status Species and Habitat," in Chapter 4 of this document) to clarify existing regulatory guidance that will guide analysis of important sites. These regulatory guidelines include listing as endangered or threatened by the federal ESA, listing as a BLM-sensitive species by the BLM State Director, or listing as a California Native Plant Society (CNPS)-rare species.

Timing of Site Characterization

Commenters expressed the following concerns:

- Known and probable sensitive sites should be identified before plan adoption (or as a key goal following plan adoption).
- Sensitive site characterization should be conducted in collaboration with DFG, FWS, NMFS, and CFGC.

Following plan adoption, further evaluation and characterization of important sites will be undertaken to prioritize management actions under the MOU with DFG and DPR. As stated above, the Proposed RMP (Section 2.3.3, "Plan Implementation Priorities," in this document) identifies a site characterization study as a pivotal first step in BLM management. This collaborative process will be undertaken with core-managing and collaborating partners to further identify important sites as new data become available.

It is important to note, however, that BLM jurisdiction does not extend to waters adjacent to and surrounding the monument. DFG, FWS, and NMFS currently regulate activities potentially affecting biological resources below mean high tide and on surrounding land and water. Please see MR-1, Jurisdictional Authority for a complete description of jurisdictional authority for activities and resources on and surrounding the CCNM. The Proposed RMP (Section 2.2.2, under "Wildlife Resources") has been revised to clarify that BLM management actions for important wildlife sites are limited to actions on monument lands only.

Seasonal Restrictions

Commenters expressed the following concerns:

- Seasonal restrictions for CCNM lands should flow directly from the process of identifying sensitive sites.
- Public access may continue to disturb wildlife before site characterization has been completed.

Based on the importance of a site from a biological, physical, and/or cultural standpoint and known use conflicts, a variety of management actions may be undertaken. Management intervention will begin with the least invasive approach (e.g., use ethics education), with seasonal access restrictions implemented on the CCNM as a last resort. Such use limitations would be implemented only on a site-specific basis where known conflicts exist and would use a science-based process to determine what limits are appropriate. For example, public use at sites where known roosting, nesting, and pupping seasons for seabirds and marine mammals occur would be limited seasonally. In cases where initial surveys determine that there is a high risk of resource damage or significant wildlife disturbance, temporary closures or use limitations may be instituted immediately while further information is collected and long-term solutions are determined. These will be the exception to normal management practices, however, and will be implemented only in situations where the potential for immediate and significant threats is identified. Any temporary closures/limitations will be followed by a process (that will include public involvement) to determine long-term management solutions.

Enforcement

Commenters expressed the following concern:

- A dynamic process for identification of sensitive wildlife resource areas may lead to confusion and enforcement problems.

As stated above, management intervention for important wildlife resources generally will begin with the least invasive approach (e.g., use ethics education), with seasonal access restrictions implemented on the CCNM as a last resort. All management actions that may affect recreationalists or other users of the coast will be publicized via signage, web site, or other educational materials. Collaboration between BLM, DPR, and DFG will further enable distribution of educational materials about necessary management actions.

Resource Inventory

Commenters expressed the following concerns:

- Resource inventory should include key vegetation and wildlife that are not limited to currently listed species.
- Preliminary research agenda should be developed after adoption of the plan to guide information collection for the resource inventory.

As stated in the Proposed RMP (Section 2.2.3, under "Research"), scientific studies will be encouraged to increase understanding of human and ecological processes and resources on the CCNM. The research and monitoring permit system, developed in coordination with FWS, NMFS, and DFG, will permit data collection that then will be consolidated into the resource inventory. This resource inventory will include biological, geologic, and cultural information collected about monument resources.

The resource inventory will include site characterizations identified to guide management actions, as well as additional research and monitoring efforts that are conducted on the CCNM. While the site characterization analysis will emphasize listed species, BLM-sensitive species, and CNPS rare species (as described above), the resource inventory will include a wide range of research topics. Top priorities for coordinated monitoring include the following:

- Seabird use of the CCNM rocks and islands,
- Pinniped use of the CCNM rocks and islands,
- Recreation activity in the vicinity of important seabird and pinniped use areas, and
- Effects of recreation activity on biological resources.

The resource inventory will support BLM's adaptive management program, enabling BLM to determine whether an objective has been met and whether to continue or modify various management actions. Management modifications or amendments to the RMP in response to new data would be developed in coordination with core-managing partners DFG and DPR. Additional research topics also will be identified, as management modifications or amendments lead to changes in human behaviors.

3.3.3 MR-3, Recreational Access

A total of 125 comments addressed issues relating to recreational access. Seventy-four of these letters stated their support for scuba diving, kayaking, clamming, abalone collecting, surf-fishing, and sport fishing along the California coast. Many expressed concern about potential limitations on recreational access. Some stated that recreational fishermen are often stewards of the coastal and marine environments, but commercial fishing practices are harmful or disruptive. Several comments also related personal anecdotes about recreational fishing with family and friends along the coast. Comment letters that consisted of expressions of preference or otherwise did not generate changes to the Draft RMP or specifically relate to the analysis in the EIS were not reprinted in this Final EIS. The authors and dates of these letters are listed in Table 3-5.

Table 3-5. Comment Letters Related to Recreational Access That Did Not Generate Changes to the EIS

Date	Author
September 23, 2004	James M. Marzec
September 23, 2004	Nicholas Dheedene
October 11, 2004	Michael Caporale
October 11, 2004	John Perez
October 12, 2004	Terry Campion
October 12, 2004	Mark Wolinsky
October 12, 2004	Bill and Marilyn Karr
October 12, 2004	Kier Staeheli
October 12, 2004	Identification Withheld
October 12, 2004	Mike Totaro

Table 3-5. Comment Letters Related to Recreational Access That Did Not Generate Changes to the EIS (continue d)

Date	Author
October 13, 2004	Holger Fuerst
October 14, 2004	Gregor M. Cailliet
October 14, 2004	Steven R. North
October 14, 2004	William Rinkes
October 15, 2004	Tom Winters
October 18, 2004	Vic Giacalone
October 19, 2004	Bill and Kevin Pisor
October 21, 2004	John Madok
October 22, 2004	Identification Withheld
October 22, 2004	Bill Wendt
October 23, 2004	Name Illegible
October 25, 2004	Identification Withheld
October 25, 2004	Ron Martin
October 27, 2004	John L. Campbell
October 27, 2004	Adam Ramirez
October 27, 2004	Identification Withheld
October 28, 2004	David Luf
October 28, 2004	Michael Taix
October 28, 2004	David Choy
October 29, 2004	Dan Peed
November 4, 2004	Jack W. Holmes
November 9, 2004	Tracy Benetti
November 10, 2004	Kieth Hezmalhalch
November 10, 2004	Alvin Brown
November 10, 2004	Michelle Innis
November 10, 2004	Identification Withheld
November 10, 2004	David Bunning
November 10, 2004	John Frazer
November 10, 2004	Frank Price
November 10, 2004	Identification Withheld
November 10, 2004	Identification Withheld
November 10, 2004	Steve Lee
November 11, 2004	Jeff Walker
November 11, 2004	Identification Withheld
November 12, 2004	Andrew Duhl
November 12, 2004	Thomas R. Bradley
November 12, 2004	Identification Withheld
November 13, 2004	Identification Withheld

Table 3-5. Comment Letters Related to Recreational Access That Did Not Generate Changes to the EIS (continue d)

Date	Author
November 14, 2004	John D. Gahn
November 15, 2004	Hoa Tran
November 15, 2004	Ed Tolman
November 16, 2004	Identification Withheld
November 17, 2004	James Baumgart
November 17, 2004	Identification Withheld
November 17, 2004	John Schaffer
November 20, 2004	Gary Borgnino
November 22, 2004	Identification Withheld
November 23, 2004	John Hanson
November 23, 2004	Michael Bradburn
November 23, 2004	Michael Fornes
November 23, 2004	Jack Maryon
November 23, 2004	Ray Alikhani
November 24, 2004	Identification Withheld
November 24, 2004	J.D. Graham
November 26, 2004	Karl Smith
December 2, 2004	Identification Withheld
December 3, 2004	Aaron Roslie
December 5, 2004	Frank Polak
December 8, 2004	Identification Withheld
December 8, 2004	Identification Withheld
December 8, 2004	Identification Withheld
December 8, 2004	Identification Withheld
December 15, 2004	Identification Withheld
No Date	Mark Wallace
No Date	John A. Freeman

The remaining 53 comments identified more specific issues and concerns to be addressed in the Final EIS. Authors and dates of these letters are listed in Table 3-6. A discussion in response to all comments follows below.

Table 3-6. Comment Letters Related to Recreational Access That Generated Changes to the EIS

Comment Identification Number	Author
2-A	James A. Springer
2-C	James A. Springer
2-E	James A. Springer
6-F	Recreational Fishing Alliance (RFA)
6-I	RFA
6-U	RFA
6-V	RFA
6-W	RFA
6-X	RFA
6-Y	RFA
7-A	Matthew Rode
8-B	Howard Egan, RFA
8-D	Howard Egan, RFA
8-F	Howard Egan, RFA
8-I	Howard Egan, RFA
9-A	Tom Lima
12-E	Mark Cortright
15-A	Kit Mann, Kokatat Water Sportswear
15-E	Kit Mann, Kokatat Water Sportswear
15-I	Kit Mann, Kokatat Water Sportswear
18-A	Cliff Hart
18-B	Cliff Hart
20-D	Melody Hamilton
21-A	Rodney A. Reindl, Sharon K. Reindl, Mark J. Reindl, and Kathryn M. Reindl
24-A	Identification Withheld
27-D	Mike Zamboni
30-B	Anthony Betancur
32-B	Carl B. Lind
34-B	Glenn Stockwell
40-B	Cristy Sabo
41-I	U.S. Fish and Wildlife Service
41-J	U.S. Fish and Wildlife Service
42-C	Sonoma County Abalone Network
42-J	Sonoma County Abalone Network

Table 3-6. Comment Letters Related to Recreational Access That Generated Changes to the EIS (continued)

Comment Identification Number	Author
42-L	Sonoma County Abalone Network
44-D	Mendocino Coast Audubon Society
44-F	Mendocino Coast Audubon Society
46-I	NOAA Monterey Bay National Marine Sanctuary
46-J	NOAA Monterey Bay National Marine Sanctuary
47-C	NOAA National Marine Fisheries Service (NMFS)
47-O	NMFS
47-Z	NMFS
47-DD	NMFS
48-QQ	U.S. Navy
50-A	Kort Orbach
50-C	Kort Orbach
51-I	Charles Wilson
57-N	Sierra Club, Coastal Programs
59-E	National Marine Manufacturers Association
59-F	National Marine Manufacturers Association
59-L	National Marine Manufacturers Association
60-D	American Sportfishing Association
65-A	Howard Egan

Substantive comments on recreational access addressed concerns relating to recreational access, recreational fishing and boating, wildlife disturbance, seasonal restrictions, and aircraft restrictions. The bulleted lists below describe public comments in more detail, followed by BLM's responses to these concerns.

Recreational Access

Commenters expressed the following concerns:

- The RMP may result in a loss of recreational access along the California coast.
- The RMP should restrict all recreation on the monument.
- BLM should provide for full access to monument lands, including provisions for new boat ramps, restrooms, parking, and commercial vending.
- Multi-purpose management should be sought, not restricted access.
- Some level of disturbance should be tolerated to allow recreational access.
- Exceptions should be made for access as needed to protect human safety.

- Restrictions should be established only in collaboration with DFG, based on scientific findings.
- Limited points of recreational access should be provided, per existing state and local facilities.

BLM intends to manage recreation activities conducted on monument lands only. BLM defines recreation as "The enjoyment of scenery, water, primitive or natural landscape, wildlife, natural phenomena, and archeological and historical sites in one's leisure time." Recreation will be permitted where consistent with the mandates included in the Presidential Proclamation, which emphasizes the protection of resources (e.g., seabird and marine mammal habitat), or where it is consistent with protection of human safety. The Proposed RMP (Section 2.2.3, under "Recreation") has been clarified regarding permissible and prohibited activities within BLM jurisdiction (i.e., on the rocks and islands above mean high tide).

The Introduction of the Proposed RMP (Section 1.3.2, "Management Boundaries") has been revised to describe the activities on and adjacent to the CCNM that are regulated by other agencies. Please also see the discussion of jurisdiction in MR-1, Jurisdictional Authority.

Section 2.3.5, "Monitoring and Adaptive Response Program," in the Proposed RMP (Chapter 2 of this document) identifies an adaptive management approach to preserving monument resources. Protection of wildlife resources will be sought in the least invasive way (e.g., ethics education); seasonal access restrictions will be implemented in collaboration with core-managing partners DFG and DPR as a last resort. BLM's intent to minimally implement access restrictions on the CCNM for resource protection is clearly stated in MR-2, Sensitive Site Characterization.

Recreational Fishing and Boating

Commenters expressed the following concerns:

- The RMP will affect recreational access in surrounding waters, including: recreational fishing by boat, surfboard, and kayak; and skin and scuba diving.
- BLM should not diminish existing recreational fishing rights, access, or boating; clarify BLM's intention.
- BLM should add sportfishing, clamming, and tidepooling to the list of low impact/appropriate activities permitted on the monument.
- The Draft RMP/Draft EIS is not intended to "supercede or materially modify current or future uses (i.e., recreational fishing)managed by other entities."
- BLM should clarify whether it is instituting a de-facto ban on sportfishing.
- Surfers, divers, and abalone harvesters sometimes use rocks and islands as resting areas for safety concerns.
- BLM should clarify the recreational activities permitted, allowed, and restricted.
- RMP statements that recreational boating disturbs marine mammals, seabirds, or other wildlife are not correct.

BLM will not regulate activities outside of its jurisdiction (i.e., below mean high tide and on surrounding water and land) which include, but are not limited to, the use of aircraft, commercial and sport fishing, commercial and recreational boating, commercial and recreational seaweed harvesting, abalone collection, clamming, recreational kayaking, snorkeling, scuba diving, skin diving, and surfing. Please see the matrix of jurisdictional authority for local, state, and federal agencies in MR-1, Jurisdictional Authority. The Proposed RMP (Section 2.2.3, under "Recreation") has been clarified regarding permissible and prohibited activities within BLM jurisdiction.

BLM will not diminish existing recreational fishing rights, access, or boating, except where conducted from monument lands. Sportfishing, clamming, and tidepooling may be permitted on the monument, unless BLM's site characterization study determines that recreational access is affecting important wildlife resources. Please see the discussion of the site characterization study in MR-2, Sensitive Site Characterization. Further research will be permitted to ascertain the impacts of recreational boating and other activities on marine mammals, seabirds, or other wildlife.

Wildlife Disturbance

Commenters expressed the following concerns:

- BLM should use interpretive and volunteer programming to discourage wildlife disturbances without officially restricting recreational access (in addition to collaboration with Gulf of the Farallones National Marine Sanctuary [GFNMS] and MBNMS).
- BLM should clarify such terms as "low impact," "view from afar," and "disturbance."
- Recreational fishing is low impact, due to current DFG and NOAA regulations.
- Access restrictions should be used to prevent disturbance of wildlife; human access should be limited only to mainland interpretive centers.

BLM intends to manage recreational fishing when it occurs from monument lands and results in disturbance of CCNM's wildlife resources. BLM defines disturbance as "A natural or human-induced environmental change that alters one or more of the floral, faunal, and microbial communities within the ecosystem. Disturbance to wildlife is anything that causes them to deviate from their normal activities such that it makes it difficult to complete their life cycles." BLM will use an adaptive approach to management in order to protect important plant communities and wildlife resources on the CCNM. In the case that wildlife disturbance is occurring, management intervention will begin with the least invasive approach, such as education and interpretation of the monument's resources and how disturbance affects such resources. Recreational access restrictions will be implemented on the CCNM as a last resort. Please see the discussion of seasonal restrictions in MR-2, Sensitive Site Characterization.

The terms "enjoy from afar" and "low-impact recreation" have been removed from the Proposed RMP because they are subject to multiple interpretations. BLM intends to focus development of recreational and educational access on those activities with little or no potential impact on monument resources (activities that occur primarily on the mainland adjacent to CCNM rocks and islands).

Seasonal Restrictions

Commenters expressed the following concerns:

- Seasonal restrictions (buffer zones) exceed BLM's jurisdiction by regulating activities in surrounding waters.
- Seasonal restrictions (buffer zones) will affect commercial fishermen and seaweed harvesters.

- Buffer zones should be established around sensitive resources.

Recreational activities, where they occur on the CCNM, will be restricted on a site-specific basis where known problems or resource conflicts exist. In these cases, a range of management actions will be considered, with access restrictions implemented when other actions are deemed infeasible. Seasonal restrictions will apply to monument lands only and will not include buffer zones that extend outside BLM's jurisdiction into surrounding waters. Commercial fisherman and seaweed harvesters will not be affected by on-monument restrictions.

BLM will work in partnership with FWS, NMFS, and DFG regarding the management of both the wildlife and the wildlife habitat associated with the CCNM.

Aircraft Restrictions

Commenters expressed the following concern:

- All forms of aircraft should be managed: airplanes, helicopters, ultralights, hang gliders, and kites.

Recreational activities outside monument lands (i.e., in the adjacent waters, air space, or mainland areas) will continue to be managed by agencies with appropriate jurisdiction. Please see the matrix of jurisdictional authority for local, state, and federal agencies in MR-1, Jurisdictional Authority.

3.4 Comments in Support of Recreational Fishing Alliance

Fifty-three comment letters contained statements in support of the Recreational Fishing Alliance's (RFA's) comments. Many of these letters also stated their support of recreational fishing and diving, while others contained personal anecdotes about time spent fishing and boating along the coast. Because these comment letters did not generate changes to the EIS or require unique responses not already contained in the response to the RFA's letter, they are not reprinted in this Final EIS. The authors and dates of these letters are listed in Table 3-7.

Table 3-7. Comment Letters Supporting Recreational Fishing and Diving

Date	Author
October 10, 2004	Steve Christensen
October 10, 2004	Todd Fraser
October 10, 2004	Kurtis Williams
October 10, 2004	Joe Drapchaty
October 10, 2004	Milo Vukovich
October 11, 2004	Jim Hooper

Table 3-7. Comment Letters Supporting Recreational Fishing and Diving (continue d)

Date	Author
October 11, 2004	Michael Caporale
October 11, 2004	John Perez
October 12, 2004	Mark Wolinsky
October 12, 2004	Greg Meriales
October 12, 2004	Anthony Reitz
October 12, 2004	Identification Withheld
October 12, 2004	Mike Totaro
October 13, 2004	Holger Fuerst
October 13, 2004	Identification Withheld
October 13, 2004	Jeff Fornes
October 14, 2004	James A. Pigula
October 14, 2004	Jeremy Pigula
October 14, 2004	Steven R. North
October 14, 2004	Richard Hargreaves
October 14, 2004	William Rinkes
October 14, 2004	Ed Atherton
October 15, 2004	Mark Sullivan
October 15, 2004	Tom Winters
October 16, 2004	David Biagini
October 17, 2004	Robert Mendez
October 17, 2004	Jesabell Niar
October 18, 2004	Vic Giacalone
October 18, 2004	Harry A. Hill
October 19, 2004	Bill Pisor, Kevin Pisor
October 19, 2004	Bob Mendez
October 19, 2004	Charles R. Ralston III, Jennifer L. Ralston, Gage E. Ralston, Kyle J. Ralston
October 21, 2004	Michael J. Hemsley
October 21, 2004	John Madok
October 21, 2004	Mark P.
October 23, 2004	Elric Leano
October 23, 2004	Michael Hale
October 23, 2004	Paul J. Ladden
October 25, 2004	John Wurster
October 25, 2004	Ron Martin
October 26, 2004	Sergey Landa

Table 3-7. Comment Letters Supporting Recreational Fishing and Diving (continued)

Date	Author
October 27, 2004	Scott Bradley
October 27, 2004	Adam Ramirez
October 28, 2004	David Luff
October 29, 2004	Dan Peed
November 3, 2004	Marc Sullivan
November 9, 2004	Tracy Benetti
November 11, 2004	Mario De Sousa
November 16, 2004	John Schmitz
November 18, 2004	Charles Lung
November 20, 2004	Gary Borgnino
November 30, 2004	Emanuel Armstrong

Response to Comments in Support of RFA: Please see responses to Comment Letter 6. Please see also the three master responses above.

3.5 Individual Responses to Comments

The following represents BLM's responses to all substantive comments received during the public comment period on the Draft RMP/Draft EIS.

Letter 1 Identification Withheld (September 22, 2004)

Response to Comment 1-A: BLM has no jurisdiction over surrounding waters and therefore will not regulate boating and fishing activities, except when conducted from monument lands. Limitations on recreational fishing from monument lands are not anticipated to affect coastal economies. Please see MR-1, Jurisdictional Authority.

Response to Comment 1-B: The comment does not address a substantive issue related to the Draft RMP/Draft EIS and therefore has not been addressed further.

Response to Comment 1-C: Comment noted.

Letter 2 James A. Springer (September 23, 2004)

Response to Comment 2-A: Please see MR-3, Recreational Access.

Response to Comment 2-B: Please see MR-1, Jurisdictional Authority.

Response to Comment 2-C: Please see MR-3, Recreational Access.

Response to Comment 2-D: Comment noted. The No Action Alternative, which corresponds to management by existing laws and regulations only, would not provide for the coordinated management of monument resources and does not best fulfill the intent of the Presidential Proclamation. Alternative A was selected as the preferred alternative because it best fulfills the protective purpose of the monument while still allowing a reasonable level of public access to, and use of, the CCNM.

Response to Comment 2-E: Please see MR-3, Recreational Access.

Letter 3 Identification Withheld (September 25, 2004)

Response to Comment 3-A: Under the discretionary authority given to the President of the United States by Section 2 of the Antiquities Act of 1906 (34 Stat. 225, 16 USC 431), President Clinton established the CCNM by Presidential Proclamation No. 7264 on January 11, 2000. As stated in the Presidential Proclamation, the purpose of the CCNM is to protect the geologic formations that provide unique habitat for biota on all unappropriated and unreserved land and interests in lands owned or controlled by the United States in the form of islands, rocks, exposed reefs, and pinnacles above mean high tide within 12 nautical miles of the shoreline of the State of California.

Response to Comment 3-B: Comment noted.

Letter 4 Southern California Association of Governments (October 5, 2004)

Response to Comment 4-A: Comment noted.

Letter 5 Louise Mariana (October 5, 2004)

Response to Comment 5-A: The CCNM was established primarily to protect the geologic formations that provide habitat for plants and animals, including seabirds and marine mammals; within this context, a prioritizing mechanism will be developed to identify sites in need of management attention, as discussed in the tiered adaptive management approach in the Proposed RMP. An evaluation of specific sites will be undertaken to prioritize further management actions under the MOU with DFG and DPR. Please see MR-2, Sensitive Site Characterization. BLM has no jurisdiction over surrounding waters and therefore will not regulate boating and fishing activities, except when conducted from monument lands. Please see MR-1, Jurisdictional Authority.

Response to Comment 5-B: Comment noted. As discussed in the Draft RMP/Draft EIS (page 4.15-6), printed media will be considered as a method to disseminate information about the CCNM. Printed media as well as contact with rental shops also will be considered as a method to raise awareness among recreationists regarding the important resources contained within the CCNM.

Response to Comment 5-C: Oil and gas exploration is prohibited on the monument. BLM also is committed to working with core-managing partners and collaborators to respond quickly and efficiently to oil spills along the coast.

Response to Comment 5-D: Please see MR-1, Jurisdictional Authority.

Response to Comment 5-E: The CCNM was established primarily to protect the geologic formations that provide habitat for plants and animals, including seabirds and marine mammals; within this context, a prioritizing mechanism will be developed to identify sites in need of management attention. Please see MR-2, Sensitive Site Characterization.

Letter 6 Recreational Fishing Alliance (October 26, 2004)

Response to Comment 6-A: Please see MR-1, Jurisdictional Authority.

Response to Comment 6-B: As noted in the Draft RMP/Draft EIS (page 5-4), NMFS was contacted on October 18, 2002, and was invited to participate in the RMP and NEPA processes. Also listed (page 5-10) are five NMFS staff who participated in the development of the Draft RMP/Draft EIS. Correspondence from NMFS was received on the Draft RMP/Draft EIS and is reprinted in this document.

Response to Comment 6-C: BLM has no jurisdiction over surrounding waters and therefore will not regulate recreational fishing, except when conducted from monument lands. Language in the Proposed RMP (see Chapter 2) has been clarified as such.

Response to Comment 6-D: Please see MR-1, Jurisdictional Authority.

Response to Comment 6-E: Please see MR-1, Jurisdictional Authority.

Response to Comment 6-F: Please see MR-3, Recreational Access.

Response to Comment 6-G: BLM has no jurisdiction over surrounding waters and therefore will not regulate recreational activities, except when conducted from monument lands. Language in the Proposed RMP (see Chapter 2) has been clarified as such. BLM's approach to educational and interpretive programming will emphasize wildlife viewpoints from the mainland, with information about the importance of minimizing human disturbance of seabirds and marine mammals.

Response to Comment 6-H: Please see MR-1, Jurisdictional Authority.

Response to Comment 6-I: Please see MR-3, Recreational Access.

Response to Comment 6-J: Please see MR-2, Sensitive Site Characterization.

Response to Comment 6-K: Comment noted. Law enforcement, which will be conducted in collaboration with numerous federal, state, and local agencies along the coast, will be focused on known and potential problem areas and in reaction to threats to resources and/or human health and safety.

Response to Comment 6-L: Please see MR-2, Sensitive Site Characterization.

Response to Comment 6-M: Please see MR-2, Sensitive Site Characterization.

Response to Comment 6-N: Please see MR-2, Sensitive Site Characterization.

Response to Comment 6-O: Please see MR-1, Jurisdictional Authority.

Response to Comment 6-P: Please see MR-2, Sensitive Site Characterization.

Response to Comment 6-Q: BLM has no jurisdiction over surrounding waters and therefore will not regulate on-water recreational activities. Any limitations on recreational fishing from monument lands, if necessary under the tiered adaptive management approach discussed in the Proposed RMP, will be restricted to a small number of sites and are not expected to substantially affect coastal economies. Please see MR-1, Jurisdictional Authority.

Response to Comment 6-R: Please see MR-2, Sensitive Site Characterization.

Response to Comment 6-S: Please see MR-2, Sensitive Site Characterization.

Response to Comment 6-T: Comment noted. Stakeholders such as members of the RFA and the sportfishing community are invited to work collaboratively with the BLM in protecting the CCNM's resource values.

Response to Comment 6-U: Please see MR-3, Recreational Access.

Response to Comment 6-V: Please see MR-3, Recreational Access.

Response to Comment 6-W: Please see MR-3, Recreational Access.

Response to Comment 6-X: Please see MR-3, Recreational Access.

Response to Comment 6-Y: Please see MR-3, Recreational Access.

Letter 7 Matthew Rode (October 11, 2004)

Response to Comment 7-A: Please see MR-3, Recreational Access.

Letter 8 Howard Egan (October 14, 2004)

Response to Comment 8-A: As stated in Presidential Proclamation No. 7264, the purpose of the CCNM is to protect the geologic formations that provide habitat for plants and animals, including seabirds and marine mammals. The management actions in the Proposed RMP (see Chapter 2) seek to achieve this resource protection goal.

Response to Comment 8-B: Please see MR-3, Recreational Access.

Response to Comment 8-C: Please see MR-1, Jurisdictional Authority.

Response to Comment 8-D: Please see MR-3, Recreational Access.

Response to Comment 8-E: BLM has no jurisdiction over surrounding waters and therefore will not regulate recreational fishing, except when conducted from monument lands. Language in the Proposed RMP (see Chapter 2) has been clarified as such.

Response to Comment 8-F: Please see MR-3, Recreational Access.

Response to Comment 8-G: Please see Response to Comment Letter 6.

Response to Comment 8-H: In fulfilling the requirements of NEPA and the Presidential Proclamation, every attempt was made during the scoping process to contact all agencies and potentially interested parties to solicit input and comments. The Scoping Report summarizes these efforts. NEPA does not require additional scoping efforts beyond those summarized in the Scoping Report.

Response to Comment 8-I: Please see MR-3, Recreational Access.

Letter 9 Tom Lima (October 17, 2004)

Response to Comment 9-A: Please see MR-3, Recreational Access.

Letter 10 Khi Lai (October 21, 2004)

Response to Comment 10-A: A public meeting was held in Humboldt County on October 21, 2004, to solicit comments and input about the Draft RMP/Draft EIS. BLM staff served as facilitator for the meeting. NEPA does not require additional facilitation efforts beyond those conducted. As noted in the comment letter, BLM is interested in addressing all concerns and appreciates the input received in that meeting and through the comment letters submitted on the Draft RMP/Draft EIS. BLM also plans to work more with the Trinidad community as it proceeds with management of the CCNM.

Letter 11 Mah Dallam (October 21, 2004)

Response to Comment 11-A: We understand that questions raised at the October 21, 2004 public meeting in Humboldt County were not able to be answered to the satisfaction of all meeting participants. However, the primary purpose of those meetings was to solicit public comments on the Draft RMP/Draft EIS, rather than to resolve questions raised by the public. The Proposed RMP/Final EIS addresses questions submitted as comments on the Draft RMP/Draft EIS.

Letter 12 Mark Cortright (October 21, 2004)

Response to Comment 12-A: As noted in the Draft RMP/Draft EIS (Chapter 5, "Consultation and Coordination"), public meetings were held at seven coastal locations during 2002, where representatives from the local community—including recreationists—were invited to participate. Meeting notices were sent to approximately 500 media outlets and more than 450 individuals and organizations that announced the dates, times, and locations of the meetings. Comments and input to the RMP were welcomed during these meetings, as well as during the public review and comment period for the Draft RMP/Draft EIS. Also note that, at present, the RFA has been offered a collaborative partnership role with BLM in management of the CCNM.

Response to Comment 12-B: Law enforcement, which will be conducted in collaboration with numerous federal, state, and local agencies along the coast, will be focused on known and potential problem areas in reaction to threats to resources and/or human health and safety.

Response to Comment 12-C: Commenter's preference for Alternative C is noted.

Response to Comment 12-D: BLM has no jurisdiction over surrounding waters and therefore will not regulate recreational activities, except when conducted from monument lands. Language in the Proposed

RMP (see Chapter 2) has been clarified as such. BLM's approach to educational and interpretive programming will emphasize wildlife viewpoints from the mainland, with information about the importance of minimizing human disturbance of seabirds and marine mammals.

Response to Comment 12-E: Please see MR-3, Recreational Access.

Response to Comment 12-F: Please see MR-1, Jurisdictional Authority.

Response to Comment 12-G: Please see MR-2, Sensitive Site Characterization.

Response to Comment 12-H: The Proposed RMP emphasizes protection of seabird and marine mammal sites where known use conflicts exist. A preliminary list of important sites is provided in Appendix D of this document. As discussed in the Proposed RMP, this list will be further refined to identify sites needing management based on site-specific knowledge regarding the importance of the site and conflicts with human use. A range of possible management actions will be considered for each site. The plan will not involve a blanket management approach that fails to consider the variations in resources and resource uses in different locations. Please see also MR-2, Sensitive Site Characterization.

Response to Comment 12-I: Comment noted.

Response to Comment 12-J: Please see Response to Comment 12-A.

Letter 13 Ross Taylor (October 21, 2004)

Response to Comment 13-A: Comment noted. The presentation was designed to provide adequate background on the Draft RMP. Please refer to the Draft RMP/Draft EIS (Chapter 2, "Alternatives") for further information on the alternatives.

Letter 14 U.S. Environmental Protection Agency (October 22, 2004)

Response to Comment 14-A: Comment noted.

Letter 15 Kit Mann, Kokatat Water Sportswear (October 22, 2004)

Response to Comment 15-A: Please see MR-3, Recreational Access.

Response to Comment 15-B: Please see MR-1, Jurisdictional Authority.

Response to Comment 15-C: The CCNM was established primarily to protect the geologic formations that provide habitat for plants and animals, including seabirds and marine mammals. The Proposed RMP, Chapter 2 of this document, discusses a tiered adaptive management approach for management of wildlife habitat with consideration to human use activities. This approach is favorable to protection of both wildlife and human utilization of CCNM resources and is not directed solely by specific nesting or pupping seasons.

Response to Comment 15-D: Please see MR-1, Jurisdictional Authority.

Response to Comment 15-E: Please see MR-3, Recreational Access.

Response to Comment 15-F: Please see MR-1, Jurisdictional Authority.

Response to Comment 15-G: BLM will work with core-managing partners, collaborative partners, stewards, and others to implement the Proposed RMP.

Response to Comment 15-H: BLM has no jurisdiction over surrounding waters and therefore will not regulate recreational activities, except when conducted from monument lands. Language in the Proposed RMP (see Chapter 2) has been clarified as such. BLM's approach to educational and interpretive programming will emphasize wildlife viewpoints from the mainland, with information about the importance of minimizing human disturbance of seabirds and marine mammals.

Response to Comment 15-I: Please see MR-3, Recreational Access.

Letter 16 Michael J. Zamboni (October 22, 2004)

Response to Comment 16-A: Comment noted.

Letter 17 Michael J. Zamboni (October 22, 2004)

Response to Comment 17-A: The rocks and islands of the CCNM are intermixed with marine resources protected by the California Marine Life Protection Act (MLPA) along the length of the California coast; the CCNM is part of the larger coastal ecosystem that encompasses both the areas above and below mean high tide (the boundary of the CCNM). BLM does not have jurisdiction over the resources protected by the MLPA. As part of the goal of implementing coordinated resource management along the coast, however, BLM plans to coordinate management actions with DFG and the MLPA, given the framework identified above. Please see also the discussion of collaborative partners in MR-1, Jurisdictional Authority.

Letter 18 Cliff Hart (October 22, 2004)

Response to Comment 18-A: Please see MR-3, Recreational Access.

Response to Comment 18-B: Please see MR-3, Recreational Access.

Response to Comment 18-C: Please see MR-1, Jurisdictional Authority.

Response to Comment 18-D: Both local environmental protection and recreational groups were invited to participate during the scoping and public comment periods.

Letter 19 Tanya Smart (October 22, 2004)

Response to Comment 19-A: Comment noted.

Response to Comment 19-B: Comment noted. As stated in the Proposed RMP (Section 2.3.2, "Partnerships [Collaboration Focus]"), BLM will take an active role in promoting and coordinating research along the California coast, especially as it relates to a better understanding of the coastal resources under its stewardship and their relationship to human activity. BLM will attempt to focus the research to achieve these ends through the permitting process.

Letter 20 Melody Hamilton (October 23, 2004)

Response to Comment 20-A: Comment noted.

Response to Comment 20-B: As discussed in the Proposed RMP (Section 2.3.2, "Preservation [Management Focus]"), education is a key component around which effective management of the CCNM has been developed. Increasing awareness of the CCNM, linking existing education efforts, and planning for future education partnerships are primary tasks of the education element of the Proposed RMP.

Response to Comment 20-C: Comment noted. BLM appreciates efforts by members of the community to act as stewards of important monument resources and will actively encourage such activities under the Proposed RMP.

Response to Comment 20-D: Please see MR-3, Recreational Access.

Letter 21 Rodney A. Reindl, Sharon K. Reindl, Mark J. Reindl, and Kathryn M. Reindl (October 25, 2004)

Response to Comment 21-A: Please see MR-3, Recreational Access.

Letter 22 County of Del Norte (October 26, 2004)

Response to Comment 22-A: Comment noted. BLM does not believe that any of the management proposals in the alternatives contained in the Draft RMP would significantly affect air traffic; further, BLM does not have jurisdiction to regulate airspace above the CCNM. At such a time that specific implementation actions in the plan are identified, a review of potential effects on local infrastructure, including coastal airports, will be conducted. A project-specific NEPA analysis would be conducted if significant effects from the implementation action are likely. Please see MR-1, Jurisdictional Authority.

Response to Comment 22-B: Comment noted. BLM does not have jurisdiction to regulate activities in the waters adjacent to or in the airspace that surrounds the CCNM. At such a time that specific implementation actions in the plan that could affect commercial and private aircraft, vessels, and harbors are identified, a review of potential effects on local infrastructure, including coastal airports, will be conducted. A project-specific NEPA analysis would be conducted if significant effects from the implementation action are likely. Please see MR-1, Jurisdictional Authority.

Response to Comment 22-C: Comment noted. At such a time that specific implementation actions in the plan that could affect roadways and other transportation corridors are identified, a review of potential effects on local infrastructure, including coastal airports, will be conducted. A project-specific NEPA analysis would be conducted if significant effects from the implementation action are likely.

Response to Comment 22-D: Comment noted. As stated in Section 3.8 of the Draft RMP/Draft EIS, no Indian trust resources have been identified on monument lands. Native American requests to practice traditional activities or participate in interpretive activities on the CCNM will be welcomed and will be approved on a case-by-case basis—consistent with the overriding purpose of the monument, which is to protect the geologic formations that provide habitat for plants and animals, including seabirds and marine mammals. Revisions and corrections to the EIS are located in Chapter 4 of this document.

Response to Comment 22-E: Comment noted. The Draft RMP/Draft EIS addresses impacts on the human environment in Chapter 4, "Environmental Consequences."

Letter 23 Charles Wilson (October 26, 2004)

Response to Comment 23-A: BLM is not aware of the rock that is referenced in this comment.

Response to Comment 23-B: The Proposed RMP provides a set of management actions intended to protect the biological, geologic, and cultural resources of the CCNM. These management actions will be implemented together with DFG, DPR, and other collaborators. BLM plans to manage the monument using existing laws and regulations to the fullest extent possible and has no plans for proposing new regulations associated with the CCNM. In the future, creation of new regulations, if needed, is expected to be minimal. BLM intends to avoid the creation of new layers of bureaucracy. As clarification, the rocks and islands that are now the CCNM were first temporarily withdrawn from lands and minerals entry (e.g., they are not to be mined or sold) by Executive Order (EO) 5326 signed by President Hoover in 1930. In 1983, the Assistant Secretary of the Interior signed Public Land Order (PLO) No. 6369 revoking EO 5326, and replacing it with a 50-year lands and minerals withdrawal (except for two rocks known as Pelican and Round Rocks at Crescent City). Through Presidential Proclamation No. 7264, signed by President Clinton and creating the CCNM on January 11, 2000, the CCNM was withdrawn indefinitely from lands and minerals entry. In addition, it should be noted that the California Coastal Commission's authority does not extend to the CCNM as it is currently established since the Coastal Zone is from the mean high tide line inland, not offshore. Nevertheless, BLM is working with the California Coastal Commission to ensure that the actions resulting from the RMP are consistent with the California's local coastal programs.

Letter 24 Identification Withheld (October 29, 2004)

Response to Comment 24-A: Please see MR-3, Recreational Access.

Response to Comment 24-B: Comment noted.

Letter 25 Judd Smith (November 3, 2004)

Response to Comment 25-A: Comment noted.

Response to Comment 25-B: Degradation of CCNM resources has been documented. The Proposed RMP seeks to protect biological, geologic, and cultural resources on monument lands from future degradation.

Response to Comment 25-C: The Draft RMP/Draft EIS provides documentation of the affected environment and potential environmental consequences, pursuant to NEPA.

Response to Comment 25-D: Comment noted.

Letter 26 Judd Smith (November 3, 2004)

Response to Comment 26-A: Comment noted.

Response to Comment 26-B: Degradation of CCNM resources has been documented. The Proposed RMP seeks to protect biological, geologic, and cultural resources on monument lands from future degradation.

Response to Comment 26-C: The Draft RMP/Draft EIS provides documentation of the affected environment and potential environmental consequences, pursuant to NEPA.

Letter 27 Mike Zamboni (November 14, 2004)

Response to Comment 27-A: Comment noted.

Response to Comment 27-B: BLM has no jurisdiction over surrounding waters and therefore will not regulate boating and fishing activities, except when conducted from monument lands.

Response to Comment 27-C: Comment noted. As stated in the Proposed RMP (Section 2.2.3, under "Research"), scientific studies will be encouraged to increase understanding of human and ecological processes and resources, and to seek to understand the unique values of the CCNM. A tiered adaptive management approach (FR-WLD-4) will be implemented to ensure protection of CCNM resources with consideration of human use activities. Please see also MR-2, Sensitive Site Characterization.

Response to Comment 27-D: Please see MR-3, Recreational Access.

Letter 28 Mike Zamboni (November 14, 2004)

Response to Comment 28-A: BLM has no jurisdiction over surrounding waters, and therefore will not regulate boating and fishing activities, except when conducted from monument lands. Revisions and corrections to the Proposed RMP are located in Chapter 2 of this document. See also MR-1, Jurisdictional Authority.

Letter 29 Michael J. Zamboni (November 14, 2004)

Response to Comment 29-A: CCNM lands are owned and administered by the federal government, not state interests, and are therefore not subject to California Constitution Article 1, Section 25 nor Article X, Section 4. BLM plans to coordinate management actions on the CCNM with DFG and the MLPA. Please see also the discussion of collaborative partners in MR-1, Jurisdictional Authority.

Response to Comment 29-B: Please see MR-1, Jurisdictional Authority.

Letter 30 Anthony Betancur (November 17, 2004)

Response to Comment 30-A: Comment noted. BLM has no jurisdiction over surrounding waters and therefore will not regulate boating and fishing activities, except when conducted from monument lands.

Response to Comment 30-B: Please see MR-3, Recreational Access.

Response to Comment 30-C: Comment noted.

Letter 31 Thomas A. Garber (November 28, 2004)

Response to Comment 31-A: BLM has no jurisdiction over surrounding waters and therefore will not regulate boating and fishing activities, except when conducted from monument lands.

Letter 32 Carl B. Lind (November 30, 2004)

Response to Comment 32-A: Comment noted. BLM believes that cadastral support is necessary to improve agency understanding of the geographic extent of monument lands.

Response to Comment 32-B: Please see MR-3, Recreational Access.

Response to Comment 32-C: Comment noted. Management actions in the Proposed RMP address a range of management, protection, data collection, and permitting activities.

Response to Comment 32-D: Please see MR-1, Jurisdictional Authority.

Response to Comment 32-E: Commenter's preference for the No Action Alternative is noted.

Letter 33 Ocean Laguna Foundation (December 1, 2004)

Response to Comment 33-A: Comment noted. Management objectives for wildlife resources include maintenance and enhancement of native populations of marine birds, mammals, and intertidal species. Management actions for human activities seek to allow access while fulfilling stated objectives for wildlife resources and other considerations (e.g., human safety).

Response to Comment 33-B: The Presidential Proclamation establishing the CCNM identifies the purpose of the CCNM as protecting the resources it contains, which include biological diversity and geologic formations. Management actions in the Proposed RMP (see Chapter 2) intend to preserve these resources in perpetuity.

Response to Comment 33-C: Please see MR-2, Sensitive Site Characterization.

Response to Comment 33-D: BLM plans to implement a variety of different management approaches to ensure resource protection on the CCNM, including collaborations and partnerships. Note that BLM jurisdiction does not extend to surrounding water nor to the mainland of California. See MR-1, Jurisdictional Authority.

Response to Comment 33-E: Please see MR-2, Sensitive Site Characterization.

Response to Comment 33-F: Comment noted.

Response to Comment 33-G: Please see MR-1, Jurisdictional Authority.

Letter 34 Glenn Stockwell (December 6, 2004)

Response to Comment 34-A: The Presidential Proclamation establishing the CCNM identifies the purpose of the CCNM as protecting the resources it contains, which include biological diversity and geologic formations. To protect these resources, BLM has identified management actions in the RMP that extend beyond bans on commercial exploitation. However, the RMP does not preclude many forms of low-impact public utilization. Please refer to MR-3, Recreational Access.

Response to Comment 34-B: Please see MR-3, Recreational Access.

Response to Comment 34-C: Please see MR-1, Jurisdictional Authority.

Letter 35 Identification Withheld (December 9, 2004)

Response to Comment 35-A: As stated in the Draft RMP/Draft EIS (Section 3.2.2.1, "Vegetation Resources,"), most of the offshore rocks and islands lack soil sufficient to support complex vegetation. However, a few islands do support a variety of plants. The plant species at these sites are believed to be largely representative of adjacent mainland communities that existed before human disturbance and modification began. In addition, because the islands are remote, some level of endemism may be represented by yet undocumented, unique taxa in these communities.

Response to Comment 35-B: Comment noted.

Letter 36 Cristy Sabo (December 10, 2004)

Response to Comment 36-A: Commenter's preference is noted. New facilities and increased visitation related to CCNM management in Trinidad are anticipated to be minimal.

Letter 37 U.S. Coast Guard (December 10, 2004)

Response to Comment 37-A: Nothing in this plan expressly or implicitly precludes, restricts, or requires modification of current or future authorized uses of the lands, waters, or airspace adjacent to the CCNM by the U.S. Coast Guard (USCG). Please see also MR-1, Jurisdictional Authority. BLM has included provisions in the Proposed RMP (AU-LUA-2) for creating and maintaining aids-to-navigation.

Response to Comment 37-B: Comment noted. BLM recognizes the USCG's authority in the establishment, maintenance, and operation of aids-to-navigation. BLM has included provisions in the Proposed RMP (AU-LUA-2) for aids-to-navigation.

Response to Comment 37-C: Nothing in this plan expressly or implicitly precludes, restricts, or requires modification of current or future authorized uses of the lands, waters, or airspace adjacent to the CCNM by the USCG. BLM is committed to working together through collaborative partnerships to protect the monument's natural resources and to enforce environmental laws. Please see also MR-1, Jurisdictional Authority.

Letter 38 Surfrider Foundation (December 10, 2004)

Response to Comment 38-A: Comment noted. Please see also MR-1, Jurisdictional Authority.

Response to Comment 38-B: Comment noted.

Response to Comment 38-C: Comment noted.

Letter 39 Natural Resources Defense Council (December 10, 2004)

Response to Comment 39-A: Comment noted. Please see MR-2, Sensitive Site Characterization.

Response to Comment 39-B: Comment noted. As discussed in the Proposed RMP (FR-EDU-2), BLM will make efforts to link with existing educational outlets, such as web-based media.

Response to Comment 39-C: Please see MR-1, Jurisdictional Authority.

Response to Comment 39-D: Please see MR-1, Jurisdictional Authority.

Letter 40 Cristy Sabo (December 12, 2004)

Response to Comment 40-A: Commenter's preference is noted. New facilities and increased visitation related to CCNM management in Trinidad are anticipated to be minimal.

Response to Comment 40-B: Please see MR-3, Recreational Access.

Response to Comment 40-C: Comment noted. BLM intends to implement its recreation and education/interpretation programs by making maximum use of pre-existing facilities, such as those at Trinidad State Beach.

Letter 41 U.S. Fish and Wildlife Service (December 13, 2004)

Response to Comment 41-A: Comment noted.

Response to Comment 41-B: Commenter's preference for Alternative A is noted. Information regarding the potential adverse effects of Alternatives B and C are appreciated and reflect the analysis contained in the Draft EIS.

Response to Comment 41-C: The Proposed RMP (Section 2.2.3, under "Recreation") will limit use of monument lands for launching or staging of recreational activities where important resources exist. BLM will use a range of management actions for resource protection, including development of educational materials and signage identifying important monument resources that should not be accessed during low tide.

Response to Comment 41-D: Revisions and corrections to the Introduction (see Figure 1-4b) are located in Chapter 1 of this document.

Response to Comment 41-E: Revisions and corrections to the Introduction (see Figure 1-4c) are located in Chapter 1 of this document.

Response to Comment 41-F: Revisions and corrections to the Introduction (see Figure 1-4d) are located in Chapter 1 of this document.

Response to Comment 41-G: Revisions and corrections to the Introduction (see Figure 1-4e) are located in Chapter 1 of this document.

Response to Comment 41-H: Revisions and corrections to the Proposed RMP (see Figure 2-2b) are located in Chapter 2 of this document.

Response to Comment 41-I: Please see MR-3, Recreational Access.

Response to Comment 41-J: Please see MR-3, Recreational Access.

Response to Comment 41-K: The Proposed RMP, Chapter 2 of this document, discusses a tiered adaptive management approach for management of wildlife habitat and human uses. As noted in the comment, use restrictions will be evaluated on a site-by-site basis.

Response to Comment 41-L: Comment noted. Revisions and corrections to the Proposed RMP are located in Chapter 2 of this document.

Response to Comment 41-M: Comment noted. The Proposed RMP (Section 2.2.2, under "Wildlife Resources") contains a revised discussion of measures for protection of wildlife habitat within the CCNM. Table 2-6 has been removed from the Proposed RMP/Final EIS and has been renumbered as Table 3.3-2. Table 3.3-2 has been revised to reflect the correct dates for elephant seals. Revisions and corrections to the EIS (see Table 3.3-2) are located in Chapter 4 of this document.

Response to Comment 41-N: Comment noted. BLM is committed to working collaboratively with FWS and other managing partners in research and monitoring efforts.

Response to Comment 41-O: Revisions and corrections to the monitoring priorities of the Monitoring and Adaptive Response Program are located in Chapter 2 of this document.

Response to Comment 41-P: A resource inventory of vegetation and wildlife species found on the monument will be compiled by BLM as information is developed through the characterization of important sites (see MR-2, Sensitive Site Characterization) and the permitting of research activities (see discussion of Research/Monitoring Permit System in the Proposed RMP). BLM appreciates the references for information regarding vegetation on the CCNM provided in this comment.

Response to Comment 41-Q: Comment noted. As stated in the Draft RMP/Draft EIS (Section 3.3.2.2, "Wildlife Resources," page 3.3-5), a few of the rocks and island are located sufficiently close to coastal human activities to have been affected by these activities. Some of the rocks are accessible from the mainland at low tides, to both humans and their off-leash dogs. In addition to disturbing vegetation and flushing seabirds from their nests, actual destruction of burrows and nesting crevices can take place when people walk through nesting habitat.

Response to Comment 41-R: Comment noted. Revisions and corrections to the EIS are located in Chapter 4 of this document.

Response to Comment 41-S: Comment noted. However, the suggested change was not implemented.

Response to Comment 41-T: Revisions and corrections to the EIS are located in Chapter 4 of this document.

Response to Comment 41-U: Comment noted. Revisions and corrections to the EIS (see Table D-1) are located in Chapter 4 of this document.

Response to Comment 41-V: Table G-2 in the Draft RMP/Draft EIS lists a number of rocks in the Trinidad sub-unit that include Steller sea lion haul-out sites; however, BLM is unsure of the location of Sea Lion Rock. The list of known mammal sites in Table G-2 specifically did not include sites that host *Zalophus* or *Phoca*, as these were considered too numerous to list. Management of important haul-outs for these species would necessarily be done by local managers with local knowledge. (Note that this table is included as Table D-2 [in Appendix D] in this document)

Letter 42 Sonoma County Abalone Network (December 13, 2004)

Response to Comment 42-A: BLM is committed to working together with core-managing partners and other collaborators to manage the CCNM with minimal complexity and duplication of efforts.

Response to Comment 42-B: Comment noted.

Response to Comment 42-C: Please see MR-3, Recreational Access.

Response to Comment 42-D: Comment noted.

Response to Comment 42-E: Comment noted. BLM has no jurisdiction over surrounding waters, and therefore will not regulate abalone harvest, except when divers use monument lands as staging areas. Please see MR-1, Jurisdictional Authority.

Response to Comment 42-F: Please see MR-1, Jurisdictional Authority.

Response to Comment 42-G: Please see MR-2, Sensitive Site Characterization.

Response to Comment 42-H: Comment noted. The Proposed RMP, Chapter 2 of this document, discusses the tiered adaptive management approach BLM will implement to determine optimal management for protection of wildlife and human utilization of the CCNM. This approach will establish management criteria and inventory wildlife and human use of the CCNM. Both will inform implementation of a variety of management activities, with access limitation implemented as a last resort. Please see also MR-2, Sensitive Site Characterization.

Response to Comment 42-I: The Draft RMP/Draft EIS recognized that there are potential conflicts involving recreational activities during the seabird and pinniped breeding seasons. However, it is important to note that BLM has no jurisdiction over activities in surrounding waters, such as kayaking and boating. The Proposed RMP, Chapter 2, discusses the tiered adaptive management approach BLM will implement to determine optimal management for protection of wildlife and human utilization of the CCNM. This approach will establish management criteria and inventory wildlife and human use of the CCNM. Both will inform implementation of a variety of management activities, with access limitation implemented as a last resort.

Response to Comment 42-J: Please see MR-3, Recreational Access.

Response to Comment 42-K: Comment noted. The Proposed RMP (Section 2.2.3, under "Recreation") gives further definition to the allowable recreation activities on the CCNM.

Response to Comment 42-L: Please see MR-3, Recreational Access.

Response to Comment 42-M: Comment noted.

Response to Comment 42-N: Please refer to the recreation discussions in the Draft RMP/Draft EIS (Section 3.15 for the affected environment and Section 4.15 for the environmental consequences). Potential impacts on recreational use of the CCNM by fishermen, divers, boaters, and other recreational users were considered and discussed.

Letter 43 California Coastal Commission (December 13, 2004)

Response to Comment 43-A: Comment noted.

Response to Comment 43-B: Comment noted. BLM has submitted a consistency determination to the Commission concurrent with release of the Final EIS.

Response to Comment 43-C: Please see MR-1, Jurisdictional Authority.

Response to Comment 43-D: Comment noted. BLM will submit additional consistency or negative determinations to the Commission for specific projects or management actions as project need, details, and funding are developed and scheduled.

Letter 44 Mendocino Coast Audubon Society (December 14, 2004)

Response to Comment 44-A: Comment noted.

Response to Comment 44-B: Please see MR-2, Sensitive Site Characterization.

Response to Comment 44-C: Comment noted. The diverse and dynamic nature of seabirds and their nesting colonies present substantial challenges for management of CCNM lands. The Proposed RMP, Chapter 2 of this document, discusses the tiered adaptive management approach BLM will implement to determine optimal management for protection of wildlife and human utilization of the CCNM. This approach will establish management criteria and inventory wildlife and human use of the CCNM. Both will inform implementation of a variety of management activities that are sensitive to wildlife and human uses, not directly relying on specific nesting and pupping dates.

Response to Comment 44-D: Please see MR-3, Recreational Access.

Response to Comment 44-E: A variety of management strategies may be used to protect nesting and pupping areas, including full restrictions on access where necessary. Special events will be permitted on monument lands if they do not pose substantial adverse impacts on the biological, geologic, or cultural resources of the CCNM. Please see Chapter 2, "Proposed Resource Management Plan," for further information on management strategies.

Response to Comment 44-F: Please see MR-3, Recreational Access.

Letter 45 Leland R. Lewis (December 15, 2004)

Response to Comment 45-A: Further cadastral support and compilation of data for the resource inventory will be conducted following plan adoption. BLM has not yet compiled comprehensive data on all individual rocks and islands of the CCNM.

Response to Comment 45-B: Comment noted.

Letter 46 NOAA Monterey Bay National Marine Sanctuary and Gulf of the Farallones National Marine Sanctuary (December 15, 2004)

Response to Comment 46-A: Comment noted. BLM is committed to working together through collaborative partnerships to address research and monitoring, resource protection, and public education in the intertidal zone.

Response to Comment 46-B: Please see MR-2, Sensitive Site Characterization.

Response to Comment 46-C: Comment noted. BLM is committed to working together through collaborative partnerships on research and monitoring ventures that fulfill the resource protection goals of the monument.

Response to Comment 46-D: Comment noted. BLM is committed to working together through collaborative partnerships on research and monitoring ventures that fulfill the resource protection goals of the monument.

Response to Comment 46-E: Comment noted. BLM is committed to working together through collaborative partnerships on research and monitoring ventures, including membership in the SIMoN program.

Response to Comment 46-F: Comment noted. BLM is committed to working together through collaborative partnerships to address protection of marine mammals, seabirds, and other coastal wildlife.

Response to Comment 46-G: Please see MR-2, Sensitive Site Characterization.

Response to Comment 46-H: As discussed in the Draft RMP/Draft EIS (Chapter 5, "Consultation and Coordination"), participation with federal, state, local, and tribal agencies, and public parties, was welcomed during the public scoping process. Participation was also encouraged through agency coordination and collaboration, and an interdisciplinary team process.

Response to Comment 46-I: Please see MR-3, Recreational Access.

Response to Comment 46-J: Please see MR-3, Recreational Access.

Response to Comment 46-K: Comment noted. BLM is committed to working together through collaborative partnerships to address protection of marine mammals, seabirds, and other coastal wildlife.

Response to Comment 46-L: The rocks and islands of the CCNM are intermixed with marine resources protected by the California Marine Life Protection Act (MLPA) throughout the length of California. BLM will coordinate management actions with DFG and MLPA. Please see also MR-1, Jurisdictional Authority.

Response to Comment 46-M: Comment noted. As described in the Proposed RMP (OJ-EDU-4), BLM objectives for education and interpretation are to "enable frequent contact between visitors and agency personnel to foster stewardship and promote environmental education and maintenance of ecosystem integrity". This objective speaks to using interpretive activities to improve protection of CCNM resources. Improved protection using interpretive activities will be achieved through a combination of printed media, web-based media, interpretive signage, and educational programs.

Response to Comment 46-N: Comment noted. BLM will continue its involvement with the MBNMS Big Sur Coastal Ecosystem Plan. BLM is committed to working together through collaborative partnerships to develop a resource inventory for monument lands.

Response to Comment 46-O: Comment noted. As stated in the Proposed RMP (OJ-EDU-2 and OJ-EDU-3), educational and interpretive programs will be developed using existing BLM or partner facilities. Education and interpretive efforts for the CCNM will rely heavily on existing partnerships and outreach efforts of the Monterey Bay National Marine Sanctuary and other partners.

Response to Comment 46-P: Comment noted. As described in the Proposed RMP (MA-EDU-2), BLM will develop an Education and Interpretation Plan that includes a comprehensive inventory of existing coastal facilities that could serve as points of visitor contact. BLM is committed to working together through collaborative partnerships with existing organizations, programs, and facilities to develop educational and interpretive programs at these points of contact. BLM will consider membership in the Sanctuary Education Panel (SEP).

Response to Comment 46-Q: Comment noted. BLM is committed to working together through collaborative partnerships to develop educational programming for monument resources.

Response to Comment 46-R: Please see Response to Comment 46-O.

Response to Comment 46-S: Please see Response to Comment 46-O.

Response to Comment 46-T: Comment noted. The Proposed RMP (OJ-EDU-4) contains an objective addressing the issue of fostering stewardship, and reads: "enable frequent contact between visitors and agency personnel to foster stewardship and promote environmental education and maintenance of ecosystem integrity".

Response to Comment 46-U: Comment noted. BLM is committed to working together through collaborative partnerships to address protection, education, and outreach related to cultural resources.

Response to Comment 46-V: The USCG has reviewed and commented on the Draft RMP/Draft EIS. BLM is committed to working collaboratively with this agency regarding emergency response planning.

Response to Comment 46-W: BLM has no jurisdiction over surrounding waters and therefore will not regulate vessel grounds, except in limited instances where they are located on monument lands. However, BLM is committed to coordinating on emergency response as well as sharing research and monitoring data with other resource management agencies.

Response to Comment 46-X: Law enforcement will be conducted in collaboration with numerous federal, state, and local agencies along the coast.

Letter 47 NOAA National Marine Fisheries Service (December 15, 2004)

Response to Comment 47-A: Comment noted. BLM is committed to working together through collaborative partnerships to address protection of marine mammals and other coastal wildlife.

Response to Comment 47-B: Please see MR-1, Jurisdictional Authority.

Response to Comment 47-C: Please see MR-3, Recreational Access.

Response to Comment 47-D: Please see MR-1, Jurisdictional Authority.

Response to Comment 47-E: BLM is committed to management actions that fulfill the goals and objectives of the monument, which include protection of the biological, geologic, and cultural resources on offshore rocks and islands. These actions include management of wildlife habitat that is found on the monument.

Response to Comment 47-F: Comment noted.

Response to Comment 47-G: Abbreviation for the California Department of Fish and Game is "DFG" in this document.

Response to Comment 47-H: Please refer to the Draft RMP/Draft EIS, Chapter 5, "Consultation and Coordination." A summary of the scoping process and the scoping report is included in this chapter.

Response to Comment 47-I: Errata noted. Revisions and corrections to the Executive Summary are located in the front of this document.

Response to Comment 47-J: Please see MR-1, Jurisdictional Authority.

Response to Comment 47-K: Comment noted. BLM will use an adaptive management approach, thereby enabling changes to the plan as new data are collected, including acquisition of new land.

Response to Comment 47-L: Comment noted. As stated in the Proposed RMP (Section 2.2.3, under "Research"), BLM will take an active role in promoting and coordinating research along the California coast, especially as it relates to a better understanding of the coastal resources under its stewardship and their relationship to human activity. BLM will attempt to focus the research to achieve these ends through the permitting process. In addition, BLM may conduct research itself where funding is available.

Response to Comment 47-M: Errata noted. Revisions and corrections to the Executive Summary are located in the front of this document.

Response to Comment 47-N: Please see MR-1, Jurisdictional Authority.

Response to Comment 47-O: Please see MR-3, Recreational Access.

Response to Comment 47-P: Commenter's preference for Alternative C is noted. Alternative A is considered by BLM to strike the appropriate balance between resource protection and focused management of access on areas most likely to be adversely affected by human activities.

Response to Comment 47-Q: Comment noted. However, the suggested change was not implemented.

Response to Comment 47-R: Comment noted. However, the suggested change would not reflect that actual approach under Alternative C and was not implemented.

Response to Comment 47-S: Section 1.5.1 of the Draft RMP/Draft EIS ("Criteria Developed Internally") describes planning criteria that were developed during early stages of RMP preparation, and is included to allow complete understanding of the RMP development process. The RMP does not contain specific action plans for activities outside of BLM's jurisdiction that could adversely affect recreational fishing.

Response to Comment 47-T: Please see MR-1, Jurisdictional Authority.

Response to Comment 47-U: Future plan revisions and amendments will be conducted in accordance with adopted BLM guidelines for community and stakeholder participation. Revisions and corrections to the Introduction are located in Chapter 1 of this document.

Response to Comment 47-V: Please see MR-1, Jurisdictional Authority.

Response to Comment 47-W: Please see MR-1, Jurisdictional Authority.

Response to Comment 47-X: Collaborative partners and stewards are not responsible for day-to-day monument-wide administration and are thus not addressed in Section 2.3.3, "General Management Guidance."

Response to Comment 47-Y: Comment noted. In addition to coordinating with DFG to address research and scientific collecting on the CCNM, BLM will also consult with FWS and NMFS where research proposals have the potential to result in take of listed species that are under their respective jurisdictions. Revisions and corrections to the Proposed RMP are located in Chapter 2 of this document.

Response to Comment 47-Z: Please see MR-3, Recreational Access.

Response to Comment 47-AA: Comment noted. However, the suggested change would not reflect the desired approach under Alternative C and was not implemented.

Response to Comment 47-BB: Errata noted. Revisions and corrections to the EIS are located in Chapter 4 of this document.

Response to Comment 47-CC: Please see MR-1, Jurisdictional Authority.

Response to Comment 47-DD: Please see MR-3, Recreational Access.

Response to Comment 47-EE: Errata noted. Revisions and corrections to the Proposed RMP (FR-WLD-2) are located in Chapter 2 of this document.

Response to Comment 47-FF: Please see MR-2, Sensitive Site Characterization.

Response to Comment 47-GG: Errata noted. Revisions and corrections to the EIS are located in Chapter 4 of this document.

Response to Comment 47-HH: Comment noted. However, this change does not reflect the conclusions of the environmental impact analysis and has not been implemented.

Response to Comment 47-II: A list of acronyms is provided immediately following the Table of Contents of this document.

Letter 48 U.S. Navy (December 15, 2004)

Response to Comment 48-A: Presidential Proclamation No. 7264 that created the CCNM does not use the term "California mainland coast." It states "the shoreline of the State of California" and is intended to cover "all unappropriated and unreserved land and interests in lands owned or controlled by the United States in the form of islands, rocks, exposed reefs, and pinnacles above mean high tide within 12 nautical miles of the shoreline of the State of California." This covered all of the California offshore rocks and islands under the jurisdiction of the BLM. All of the Channel Islands are within the State of California. Therefore, any rocks within 12 nautical miles off the shoreline of the State of California that are not under the authorized jurisdiction (appropriated or reserved) of another entity are under the jurisdiction of BLM and are within the CCNM. Section 3.9, "Land Use/Lands and Realty," in the Draft RMP/Draft EIS includes a table of rocks and islands not included in the CCNM (see Table 3.9-1). San Nicolas Island, San Clemente Island, San Miguel Island, Prince Island off of San Miguel Island, and a number of smaller rocks are under the jurisdiction of the U.S. Navy and, therefore, are not included in the CCNM. However, rocks such as Richardson Rock (7.5 miles northwest of San Miguel Island), Wilson Rock (4.5 miles north of San Miguel Island), and Begg Rock (4.0 miles north of San Nicolas Island), are currently unappropriated and unreserved; these rocks, therefore, are under the jurisdiction of BLM and within the CCNM.

Response to Comment 48-B: Comment noted. Nothing in this plan expressly or implicitly precludes, restricts, or requires modification of current or future authorized uses of the lands, waters, or airspace adjacent to the CCNM by the DoD or its agents, allies, military range and test facility base users or range service providers. Revisions and corrections to the Proposed RMP are located in Chapter 2 of this document.

Response to Comment 48-C: Please see MR-1, Jurisdictional Authority.

Response to Comment 48-D: Please see MR-1, Jurisdictional Authority.

Response to Comment 48-E: The estimate of 11,500 rocks in BLM's earlier fact sheet was calculated more than 4 years ago, using GIS databases from the SLC and MMS. With these databases, the smallest rock size that could be identified was 4 square meters. This assessment resulted in an estimation of approximately 11,500 rocks and small islands thought to be part of the CCNM. When BLM conducted field checks of the CCNM, it was determined that—even as a conservative estimate—there are at least twice as many rocks that are smaller than 4 square meters than those that are larger. Therefore, until BLM is able to complete a more accurate survey of CCNM lands, "more than 20,000" is a good approximation.

Response to Comment 48-F: The 840-mile coastline of California is measured as the seabird flies (i.e., a straight line from the Oregon border to the border with Mexico). The 1,100-mile coastline figure, used by the California Coastal Commission, is the rough mileage of the coastline along the mainland as it curves along the shore between borders. To maintain consistency with fellow agencies, BLM will use the 1,100-mile figure.

Response to Comment 48-G: See Response to Comment 156-A. Nothing in this plan expressly or implicitly precludes, restricts, or requires modification of current or future authorized uses of the lands, waters, or airspace adjacent to the CCNM by the DoD or its agents, allies, military range and test facility base users, or range service providers.

Response to Comment 48-H: Please see MR-1, Jurisdictional Authority.

Response to Comment 48-I: Please see MR-1, Jurisdictional Authority.

Response to Comment 48-J: Comment noted. Nothing in this plan expressly or implicitly precludes, restricts, or requires modification of current or future authorized uses of the lands, waters, or airspace adjacent to the CCNM by the DoD or its agents, allies, military range and test facility base users, or range service providers.

Response to Comment 48-K: See Response to Comment 156-A.

Response to Comment 48-L: Errata noted. However, the proposed change was not made.

Response to Comment 48-M: The mission statement for the CCNM accurately reflects BLM's proposed approach to CCNM management and has not been changed. Mission statements are by nature broad.

Response to Comment 48-N: See Response to Comment 48-F.

Response to Comment 48-O: Errata noted. Revisions and corrections to the EIS are located in Chapter 4 of this document.

Response to Comment 48-P: This comment is inaccurate in that all of the alternatives except for Alternative B allow for recreation on the CCNM itself, where consistent with resource protection. BLM does not intend to regulate or otherwise manage activities outside of its jurisdiction; however, interpretive and other programs will be implemented on adjacent mainland facilities (such as those owned and managed by DPR). See also MR-1, Jurisdictional Authority. The description of action alternatives in the Executive Summary is considered reflective of the alternatives and has not been revised.

Response to Comment 48-Q: See Responses to Comments 48-E and 48-F.

Response to Comment 48-R: Nothing in this plan expressly or implicitly precludes, restricts, or requires modification of current or future authorized uses of the lands, waters, or airspace adjacent to the CCNM by the DoD or its agents, allies, military range and test facility base users, or range service providers. Revisions and corrections to the Proposed RMP are located in Chapter 2 of this document.

Response to Comment 48-S: See Response to Comment 48-M.

Response to Comment 48-T: Comment noted. However, the suggested change has not been implemented.

Response to Comment 48-U: See Response to Comments 48-A and 48-F.

Response to Comment 48-V: Please see MR-1, Jurisdictional Authority.

Response to Comment 48-W: Please see MR-1, Jurisdictional Authority.

Response to Comment 48-X: Errata noted. Revisions and corrections to the EIS are located in Chapter 4 of this document.

Response to Comment 48-Y: Errata noted. However, the proposed change was not made.

Response to Comment 48-Z: Revisions and corrections to the Proposed RMP are located in Chapter 2 of this document.

Response to Comment 48-AA: Comment noted. Thank you for providing information on the U.S. Navy's operating ranges. Nothing in this plan expressly or implicitly precludes, restricts, or requires modification of current or future authorized uses of the lands, waters, or airspace adjacent to the CCNM by the DoD or its agents, allies, military range and test facility base users, or range service providers. Revisions and corrections to the Proposed RMP are located in Chapter 2 of this document.

Response to Comment 48-BB: Inclusion of a sample activity plan in the Proposed RMP would be confusing and extraneous, as no activity plans for the CCNM have been developed to date. All BLM guidelines for public participation will be adhered to in preparation of the activity plans, including public disclosure requirements under NEPA as applicable.

Response to Comment 48-CC: Comment noted. The Introduction (Section 1.3, "Planning Area and Management Boundaries") clarifies the boundaries of the CCNM. Please see also MR-1, Jurisdictional Authority.

Response to Comment 48-DD: Errata noted. Revisions and corrections to the EIS are located in Chapter 4 of this document.

Response to Comment 48-EE: Comment noted. Revisions and corrections to the Proposed RMP (see Table 2-3) are located in Chapter 2 of this document.

Response to Comment 48-FF: See Response to Comments 48-A and 48-F.

Response to Comment 48-GG: See Response to Comments 48-A and 48-F.

Response to Comment 48-HH: Please see MR-1, Jurisdictional Authority.

Response to Comment 48-II: Errata noted. Revisions and corrections to the Proposed RMP (see Table 2-3) are located in Chapter 2 of this document.

Response to Comment 48-JJ: Please see MR-1, Jurisdictional Authority.

Response to Comment 48-KK: Comment noted. See Response to Comment 48-EE.

Response to Comment 48-LL: BLM designated the California Rocks and Islands Wildlife Sanctuary as an ACEC in 1990. As stated in the Draft RMP/Draft EIS (page 4.21-1), the existing ACEC designation will be maintained; its name will be changed to the California Coastal ACEC.

Response to Comment 48-MM: As directed in BLM's Handbook H-8160-1, *General Procedural Guidance for Native American Consultation*, BLM will consult with officials of federally recognized tribal governments (including Alaska Native corporations), representatives of non-recognized Indian communities, traditional cultural or religious leaders and practitioners, and lineal descendants of deceased Native American individuals whose remains are in federal possession or control. Revisions and corrections to the Proposed RMP are located in Chapter 2 of this document.

Response to Comment 48-NN: Comment noted. The Keeper of the National Register (NPS) generally makes a determination with consensus between one or more federal agencies and the SHPO.

Response to Comment 48-OO: Comment noted. Ground-disturbing activities need to stop only if archaeological resources or buried human remains are discovered during construction. Revisions and corrections to the Proposed RMP (Section 2.2.2, under "Cultural Resources") are located in Chapter 2 of this document.

Response to Comment 48-PP: Comment noted. Remnants of shipwrecks may be located on monument lands. Revisions and corrections to the Proposed RMP are located in Chapter 2 of this document.

Response to Comment 48-QQ: Please see MR-3, Recreational Access.

Response to Comment 48-RR: Errata noted. Revisions and corrections to the Proposed RMP are located in Chapter 2 of this document.

Response to Comment 48-SS: Please see MR-1, Jurisdictional Authority.

Response to Comment 48-TT: Please see MR-1, Jurisdictional Authority.

Response to Comment 48-UU: Nothing in this plan expressly or implicitly precludes, restricts, or requires modification of current or future authorized uses of the lands, waters, or airspace adjacent to the CCNM by the DoD or its agents, allies, military range and test facility base users, or range service providers. Please see also MR-1, Jurisdictional Authority.

Response to Comment 48-VV: Nothing in this plan expressly or implicitly precludes, restricts, or requires modification of current or future authorized uses of the lands, waters, or airspace adjacent to the CCNM by the DoD, its agents, allies, military range and test facility base users, or range service providers. Please see also MR-1, Jurisdictional Authority.

Response to Comment 48-WW: As described in the Introduction (Section 1.9, "Planning Period and Plan Revision"), the RMP will be evaluated at least once every 4–6 years to determine the need for significant management modifications or amendments to the plan. These modifications may be a result of new information from research and monitoring activities, the resource inventory compiled by BLM, or other sources. Although the Proposed RMP will provide the basis for sound management of the CCNM for a 20-year time frame, management will be adaptive to respond to changing human and natural conditions, as well as improvements in knowledge and understanding of coastal systems.

Response to Comment 48-XX: The Proposed RMP has been revised to clarify BLM's intent regarding new regulation. BLM intends to manage the monument using existing laws and regulations to the fullest extent possible and has no plans for proposing new regulations associated with the CCNM. In the future, creation of new regulations, if needed, is expected to be minimal. The Proposed RMP is located in Chapter 2 of this document.

Response to Comment 48-YY: Comment noted. Revisions and corrections to the EIS are located in Chapter 4 of this document.

Response to Comment 48-ZZ: The following list describes the various Native American tribes who traditionally lived along the California coast and potentially used monument resources for fishing or collecting. Current tribal lands—reservations and rancherías—hosting these Native American tribes also are listed.

Chumash. Occupied lands in present-day Ventura, Santa Barbara, and San Luis Obispo Counties, and portions of Los Angeles County. Along the coast and on the Channel Islands, they made their living by hunting and fishing, and utilizing shellfish resources. Today, the Santa Ynez Reservation is associated with the Chumash.

Kumeyaay (Diegueno). Occupied lands north and south of the present Mexican border. Made their living from marine resources, gathering vegetable foods, and dry farming. Today, members of this tribe occupy the Barona, Campo, Capitan Grande, Pala, San Pacual, Santa Ysabel, Sycuan, and Viejas Reservations, and Jamul Indian Village.

Luiseno-Juaneno. Occupied the coastline north of San Diego and south of Los Angeles. Made their living from marine resources and gathering vegetable foods. Today, members of this tribe occupy the La Jolla, Pala, Pechanga, Pauma-Yuima, Rincon, and Soboba Reservations.

Mattole. Occupied lands in the northwest corner of the state. Made their living by fishing and gathering along the coast, as well as major rivers of their territories. Today, members of this tribe occupy the Rohnerville Ranchería.

Coast Miwok. Occupied lands along the coast in Sonoma County. Made their living from tideland gathering of fish and shellfish. Today, this tribe has no recognized tribal lands.

Pomo. Occupied lands in the northwest corner of the state. Made their living from tideland gathering of fish and shellfish. Today, members of this tribe occupy the Big Valley, Cloverdale, Dry Creek, Grindstone, Guidiville, Hopland, Lytton, Manchester/Point Arena, Middletown, Pinoleville, Potter Valley, Redwood Valley, Robinson, Scotta Valley, Sherwood Valley, Stewarts Point, and Upper Lake Rancherías; the Coyote Valley and Round Valley Reservations; and Elem Indian Colony.

Tolowa. Occupied the coastal redwood forest areas of the northwest corner of the state. Made their living from salmon and other marine resources. Today, members of this tribe occupy the Elk Valley and Smith River Rancherías.

Wiyot. Occupied lands in the northwest corner of the state. Made their living from tideland gathering of fish, shellfish, and other marine resources. Today, members of this tribe occupy the Blue Lake, Rohnerville, and Table Bluff Rancherías.

Yuki. Occupied lands in the northwest corner of the state. Made their living from tideland gathering of fish and shellfish. Today, members of this tribe occupy the Round Valley Reservation.

Yurok. Occupied lands along the mouth of the Klamath River in the northwest corner of the state. Made their living from tideland gathering of fish and shellfish. Today, members of this tribe occupy the Yurok Reservation and Big Lagoon, Blue Lake, Elk Valley, Resighini, Smith River, and Trinidad Rancherías.

Response to Comment 48-AAA: Please see MR-1, Jurisdictional Authority.

Response to Comment 48-BBB: Comment noted. Historic properties are any prehistoric or historic district, site, building, structure, or object included in—or eligible for listing in—the NRHP. The Keeper of the National Register (NPS) generally makes a determination with consensus between one or more federal agencies and the SHPO. Revisions and corrections to the EIS are located in Chapter 4 of this document.

Response to Comment 48-CCC: See Response to Comment 156-ZZ.

Response to Comment 48-DDD: See Response to Comment 48-A.

Response to Comment 48-EEE: Please see MR-1, Jurisdictional Authority.

Response to Comment 48-FFF: Errata noted. Revisions and corrections to the EIS are located in Chapter 4 of this document.

Response to Comment 48-GGG: Errata noted. Revisions and corrections to the EIS are located in Chapter 4 of this document.

Response to Comment 48-HHH: Errata noted. Table 2-3 in the Proposed RMP (Chapter 2 of this document) includes this revision.

Response to Comment 48-III: Errata noted. Revisions and corrections to the EIS are located in Chapter 4 of this document.

Response to Comment 48-JJJ: Comment noted. While NEPA does not contain a requirement for implementation of mitigation, federal agencies have discretion under NEPA to identify a level of impact above which mitigation should be implemented. BLM has chosen to identify mitigation in this EIS.

Response to Comment 48-KKK: Errata noted. Nothing in this plan expressly or implicitly precludes, restricts, or requires modification of current or future authorized uses of the lands, waters, or airspace adjacent to the CCNM by the DoD or its agents, allies, military range and test facility base users or range service providers. Revisions and corrections to the Proposed RMP are located in Chapter 2 of this document.

Response to Comment 48-LLL: The Proposed RMP does not propose to designate the entire monument as a Cultural Resources Management Zone.

Response to Comment 48-MMM: Nothing in this plan expressly or implicitly precludes, restricts, or requires modification of current or future authorized uses of the lands, waters, or airspace adjacent to the CCNM by the DoD or its agents, allies, military range and test facility base users, or range service providers. Also note that management actions that would place CCNM staff in harm's way is not likely. Please see also MR-1, Jurisdictional Authority.

Response to Comment 48-NNN: Comment noted. As stated in Section 3.8 of the Draft RMP/Draft EIS, no Indian trust resources have been identified on monument lands. Revisions and corrections to the EIS are located in Chapter 4 of this document.

Response to Comment 48-OOO: Nothing in this plan expressly or implicitly precludes, restricts, or requires modification of current or future authorized uses of the lands, waters, or airspace adjacent to the CCNM by the DoD or its agents, allies, military range and test facility base users, or range service providers. Revisions and corrections to the Proposed RMP are located in Chapter 2 of this document.

Response to Comment 48-PPP: Errata noted. Revisions and corrections to the EIS are located in Chapter 4 of this document.

Response to Comment 48-QQQ: Comment noted.

Response to Comment 48-RRR: Using NEPA terminology and guidelines, the statement is accurate. There would be no change from existing conditions with respect to the ACEC designation. Therefore, the sentence has not been deleted.

Response to Comment 48-SSS: Comment noted. The Scoping Report contains valuable information related to the development of the Draft RMP/Draft EIS. Due to its length, the Scoping Report was included as an appendix to the Draft RMP/Draft EIS.

Response to Comment 48-TTT: See Response to Comment 156-A. Sub-Unit Map #4 has been retained to illustrate the rocks, islands, and pinnacles adjacent to San Clemente Island that are under BLM management.

Response to Comment 48-UUU: See Response to Comment 156-A. Sub-Unit Map #5 has been developed to include any rocks and pinnacles (e.g., Begg Rock) off or in the vicinity of the Southern Channel Island that are or might be within the CCNM.

Response to Comment 48-VVV: See Response to Comment 156-A. Sub-Unit Map #4 has been retained to illustrate the rocks, islands, and pinnacles adjacent to San Nicolas Island that are under BLM management.

Response to Comment 48-WWW: Errata noted. Revisions and corrections to the EIS are located in Chapter 4 of this document. The "small exposed rocks" reference applies only to La Jolla Cove and Children's Pool only (as set apart from the other features by a semi-colon). These descriptions identify the major coastal features within each sub-unit, including features that are not within the CCNM, such as Navy facilities and the Cabrillo National Monument.

Response to Comment 48-XXX: See Response to Comment 156-A.

Response to Comment 48-YYY: See Response to Comment 156-A.

Letter 49 Mendocino Seaweed Stewardship Alliance (December 15, 2004)

Response to Comment 49-A: Oil and gas exploration will be prohibited on the monument.

Response to Comment 49-B: Comment noted. BLM appreciates the offer from the Mendocino Seaweed Stewardship Alliance to become stewards of CCNM resources and will contact the Alliance regarding this request. Please see MR-1, Jurisdictional Authority.

Letter 50 Kort Orbach (December 15, 2004)

Response to Comment 50-A: Please see MR-3, Recreational Access.

Response to Comment 50-B: Comment noted. BLM has no jurisdiction over surrounding waters and therefore will not regulate boating and fishing activities. Access to conduct recreational fishing from monument lands may be limited in certain locations to protect habitat for wildlife populations using the monument.

Response to Comment 50-C: Please see MR-3, Recreational Access.

Response to Comment 50-D: Comment noted. See Response to Comment 50-B.

Letter 51 Charles Wilson (December 16, 2004)

Response to Comment 51-A: Commenter's preference for the No Action Alternative is noted.

Response to Comment 51-B: Errata noted. See Response to Comment 23-B. Regardless, the 1930 Executive Order No. 5356 was revoked in 1983 by PLO No. 6369, which was superceded by the 2000 Presidential Proclamation No. 7264 that created the CCNM. For this reason, it is the 2000 proclamation that is included in the document.

Response to Comment 51-C: The comment does not address a substantive issue related to the Draft RMP/Draft EIS and therefore has not been addressed further.

Response to Comment 51-D: Comment noted. As described in the Proposed RMP (MA-RSR-1), BLM will implement a Research/Monitoring Permit System, based on an evaluation of favorable and unfavorable criteria and an assessment of risks and benefits. The permit, developed in collaboration with the core-managing partners, will be required for scientific studies on CCNM land that involve fieldwork or specimen collection with the potential to disturb resources.

Response to Comment 51-E: Revisions and corrections to the Proposed RMP (see Figure 2-2a) are located in Chapter 2 of this document.

Response to Comment 51-F: Revisions and corrections to the Proposed RMP (see Figure 2-2b) are located in Chapter 2 of this document.

Response to Comment 51-G: Revisions and corrections to the Proposed RMP (see Figure 2-2c) are located in Chapter 2 of this document.

Response to Comment 51-H: As directed in BLM's Handbook H-8160-1, *General Procedural Guidance for Native American Consultation*, BLM will consult with officials of federally recognized tribal governments (including Alaska Native corporations), representatives of non-recognized Indian communities, traditional cultural or religious leaders and practitioners, and lineal descendants of deceased Native American individuals whose remains are in federal possession or control. Native American use of non-traditional machinery, such as motor vehicles, will not be allowed on the CCNM.

Response to Comment 51-I: Please see MR-3, Recreational Access.

Response to Comment 51-J: As discussed in the Proposed RMP (OJ-EDU-3), educational and interpretive programs would minimize the necessity for additional facilities through utilizing existing facilities, including interpretive locations or CCNM gateways.

Response to Comment 51-K: Comment noted. BLM may make targeted acquisitions where they would contribute to improved resource protection.

Response to Comment 51-L: Comment noted. Indian trust lands are those areas of land held in trust by the federal government and reserved for Indian use, including reservations and individually owned lands. Revisions and corrections to the EIS are located in Chapter 4 of this document.

Response to Comment 51-M: Revisions and corrections to the EIS (see Figure 3.1-2) are located in Chapter 4 of this document.

Response to Comment 51-N: It is BLM's intention to protect Guadalupe fur seals and their associated habitat when they occur on CCNM lands.

Response to Comment 51-O: The definition of minority populations is from BLM's Informational Memorandum 2002-164: *Guidance to Address Environmental Justice (EJ) in Land Use Plans and Related National Environmental Policy Act (NEPA) Documents.*

Letter 52 California Department of Parks and Recreation (December 16, 2004)

Response to Comment 52-A: Revisions and corrections to the Introduction (see Figure 1-4c) are located in Chapter 1 of this document.

Response to Comment 52-B: Revisions and corrections to the Introduction (see Figure 1-4d) are located in Chapter 1 of this document.

Response to Comment 52-C: Comment noted. However, because the organizations have not directly requested collaboration, the suggested change has not been implemented.

Response to Comment 52-D: Table 2-5 has been removed from the Proposed RMP/Final EIS. Revisions and corrections to the EIS (see Table 3.4-1) are located in Chapter 4 of this document.

Response to Comment 52-E: Interpretive themes, as part of the Education and Interpretation Plan (MA-EDU-2 of the Proposed RMP), would highlight intertidal resources as part of the "connection between land and sea on California's coast."

Response to Comment 52-F: Errata noted. Revisions and corrections to the EIS are located in Chapter 4 of this document.

Response to Comment 52-G: As described in the Proposed RMP (FR-CUL-5), BLM will encourage research that can better define the extent, nature, and value of cultural resources of the monument. Following any research, BLM will maintain an inventory of all monument resources. BLM will cooperate with DPR, regional information centers of the California Historical Resources Information System (CMMRIS), Native American groups represented along the coast, and other collaborators and academic institutions.

Response to Comment 52-H: Errata noted. Revisions and corrections to the EIS, Appendix C, are located in Chapter 4 of this document.

Response to Comment 52-I: Errata noted. Revisions and corrections to the EIS (see Appendix K) are located in Chapter 4 of this document.

Letter 53 U.S. Minerals Management Service (December 16, 2004)

Response to Comment 53-A: Please see MR-1, Jurisdictional Authority.

Response to Comment 53-B: Comment noted.

Response to Comment 53-C: As described in the Proposed RMP (MA-RSR-1), BLM will implement a Research/Monitoring Permit System, based on an evaluation of favorable and unfavorable criteria and an assessment of risks and benefits. The permit, developed in collaboration with the core-managing partners, will be required for scientific studies on CCNM land that involve fieldwork or specimen collection with the potential to disturb resources.

Response to Comment 53-D: Comment noted. BLM is committed to working together through collaborative partnerships to address research and monitoring, resource protection, and public education in the intertidal zone. Please see the discussion of collaborative partners in MR-1, Jurisdictional Authority.

Response to Comment 53-E: Comment noted. BLM is committed to working collaboratively with MMS on cadastral support.

Response to Comment 53-F: Section ES.4.13 lists resource and land use issues that usually are addressed by BLM in an RMP. These issues are not relevant to management of the CCNM. They were listed in the RMP to clearly document that they are not relevant to CCNM management.

Letter 54 Mendonoma Marine Life Conservancy (December 16, 2004)

Response to Comment 54-A: Commenter's preference for Alternative B is noted.

Response to Comment 54-B: Comment noted.

Response to Comment 54-C: Comment noted. Oil and gas drilling is prohibited on the monument. BLM also is committed to working with core-managing partners and collaborators to respond quickly and efficiently to oil spills along the coast.

Response to Comment 54-D: The CCNM was established primarily to protect the geologic formations that provide habitat for plants and animals, including seabirds and marine mammals. Animals such as the mountain beaver, Laysan albatross, magnificent frigatebird, elephant seal, and river otter that might be using the rocks of the CCNM will be considered in management of the CCNM; these species should benefit from management actions planned for more common species. A more comprehensive resource inventory of vegetation and wildlife species found on the monument will be compiled by BLM as information is developed through the characterization of sites (see MR-2, Sensitive Site Characterization) and permitting of research activities (see the discussion of Research/Monitoring Permit System in MA-RSR-1).

Response to Comment 54-E: Comment noted.

Response to Comment 54-F: The Proposed RMP identifies pre-existing visitor facilities and infrastructure that may accommodate CCNM educational and interpretive exhibits. Educational exhibits and the "Virtual Monument" web site are intended to educate individuals and organizations about monument resources.

Response to Comment 54-G: The Proposed RMP states that points of recreational access will be designated in proximity to pre-existing recreational areas and opportunities (i.e., BLM properties, State parks, boat launches, and overlooks). However, this would not reduce impacts on recreational activities that can occur only on the CCNM itself and so would not reduce this impact.

Response to Comment 54-H: Comment noted. Thank you for providing information on the relationship of the CCNM to the Kashaya.

Response to Comment 54-I: BLM will consider collaboration with Tribes in development of trail connections to inland and coastal networks.

Response to Comment 54-J: Comment noted.

Response to Comment 54-K: Comment noted. Oil and gas exploration will be prohibited on the monument. BLM also is committed to working with core-managing partners and collaborators to respond quickly and efficiently to oil spills along the coast.

Letter 55 Maritime Shoshone, Inc. (December 16, 2004)

Response to Comment 55-A: Comment noted. Thank you for providing information on Island/Adjacent Mainland Coast Shoshone fishing and subsistence practices. BLM is committed to working together through collaborative partnerships to share information and address tribal practices in the CCNM. Please see also MR-1, Jurisdictional Authority.

Response to Comment 55-B: Comment noted. Thank you for providing information on Island/Adjacent Mainland Coast Shoshone navigation practices.

Response to Comment 55-C: Comment noted. Thank you for providing information on Island/Adjacent Mainland Coast Shoshone mythology.

Response to Comment 55-D: Comment noted. BLM is committed to working together through collaborative partnerships to address public educational and interpretive activities. Please see also MR-1, Jurisdictional Authority.

Letter 56 California State Lands Commission (December 17, 2004)

Response to Comment 56-A: Comment noted.

Response to Comment 56-B: Comment noted. BLM recognizes that title to all abandoned shipwrecks and all archaeological sites and historic resources on or in the tide and submerged lands of California are vested in the State. BLM is committed to working together through collaborative partnerships to address shared management of shipwreck remnants on CCNM lands or that cross jurisdictional boundaries. Please see also MR-1, Jurisdictional Authority.

Response to Comment 56-C: Comment noted. BLM is committed to working together through collaborative partnerships to address shared management of cultural resources on CCNM lands. BLM will consider joint review of research permits for disturbance of archaeological or historical resources that cross jurisdictional boundaries. Please see also MR-1, Jurisdictional Authority.

Response to Comment 56-D: See Response to Comment 165-B.

Response to Comment 56-E: BLM is committed to working together through collaborative partnerships to address shared management and public education of shipwreck remnants. BLM will work with the SLC in a collaborative effort if a "Shipwreck Trail" of known shipwrecks in the CCNM is developed. Please see also MR-1, Jurisdictional Authority.

Response to Comment 56-F: See Response to Comment 56-B. Revisions and corrections to the EIS are located in Chapter 4 of this document.

Response to Comment 56-G: Errata noted. Revisions and corrections to the EIS are located in Chapter 4 of this document.

Letter 57 Sierra Club, Coastal Programs (December 16, 2004)

Response to Comment 57-A: Comment noted.

Response to Comment 57-B: Please see MR-1, Jurisdictional Authority.

Response to Comment 57-C: Comment noted. The Tourism Marketing Plan is intended to establish key messages to be used in materials that will educate the public about important monument resources. It is not intended to increase visitor uses that could degrade CCNM resources.

Response to Comment 57-D: Commenter's preference for Alternative B is noted.

Response to Comment 57-E: Comment noted.

Response to Comment 57-F: Comment noted. BLM is committed to protecting the visual and other resources of the monument that maintain its wilderness character.

Response to Comment 57-G: Commenter's preference for Alternative B is noted.

Response to Comment 57-H: Comment noted.

Response to Comment 57-I: Comment noted. Inventory activities will avoid adverse effects on CCNM resources.

Response to Comment 57-J: Comment noted. As described in the Proposed RMP (FR-CUL-2), BLM will establish a program of government-to-government consultation with the NAHC and interested Native American tribes. Native American requests to practice traditional activities or participate in interpretive activities on the CCNM will be welcomed and will be approved on a case-by-case basis—consistent with the overriding purpose of monument management, which is preservation of the biological, geologic, and cultural resources of the monument.

Response to Comment 57-K: As stated in the Proposed RMP (Section 2.2.3, under "Research"), BLM will take an active role in promoting and coordinating research along the California coast, especially as it relates to a better understanding of the coastal resources under its stewardship and their relationship to human activity. However, the suitability of proposed research would diminish if the potential exists for an adverse effect on natural, cultural, or scenic resources.

Response to Comment 57-L: BLM does not have jurisdiction to regulate airplane overflights. Please see MR-1, Jurisdictional Authority.

Response to Comment 57-M: Comment noted.

Response to Comment 57-N: Please see MR-3, Recreational Access.

Response to Comment 57-O: BLM is committed to protecting the visual and other resources of the monument that maintain its wilderness character.

Response to Comment 57-P: Comment noted. One of the primary goals of the Proposed RMP (Section 2.2.1, "Management Goals—Goal 4") is to "Provide the public with interpretive information and educational initiatives regarding the values and significance of the CCNM and the fragile ecosystems of the California coastline." This would be achieved through printed and web-based media, educational programs, and signage.

Response to Comment 57-Q: BLM believes that effective management of CCNM resources requires a full understanding of resource components, their interrelationships and processes, and the effects of human activities on and adjacent to the monument. Therefore, permitting of research (MA-RSR-1) will attempt to achieve a balance between gathering important scientific data needed to understand and protect the ecological integrity of the CCNM and protecting that integrity from intrusion of the research process.

Response to Comment 57-R: Please see MR-2, Sensitive Site Characterization.

Letter 58 National Park Service, Pt. Reyes National Seashore (December 16, 2004)

Response to Comment 58-A: Comment noted. BLM is interested in collaborative opportunities with NPS, Pt. Reyes National Seashore.

Response to Comment 58-B: Comment noted. Revisions and corrections to the law enforcement discussion (Section 2.3.4, under "Specific Management Approaches") are located in Chapter 2 of this document.

Response to Comment 58-C: Comment noted. BLM is committed to working together through collaborative partnerships to develop educational and interpretive programs about the monument.

Response to Comment 58-D: Comment noted. BLM is committed to working together through collaborative partnerships on research and monitoring efforts.

Response to Comment 58-E: Comment noted. BLM is committed to working together through collaborative partnerships to address protection of the cultural and natural resources of the monument.

Response to Comment 58-F: The primary role of the CCNM relating to the conservation and recovery of special-status wildlife species would be to protect offshore rocks and islands in providing breeding, nesting, *and resting* sites for these species. BLM has no jurisdiction over surrounding waters and therefore will not regulate fishing, surfing, or abalone harvesting activities—except when conducted from monument lands.

Response to Comment 58-G: BLM appreciates information from NPS regarding its invasive species program. The Proposed RMP (MA-VEG-4) clearly states that invasive species control measures would primarily consist of manual and mechanical removal, and use of fire. Use of herbicides and pesticides would be minimized, and would follow all necessary precautions to avoid effects on non-target species. Potential introduction of invasive species by human use (i.e., footwear and equipment) is highly unlikely for monument lands, due to limited public access and use restrictions

Letter 59 National Marine Manufacturers Association (December 16, 2004)

Response to Comment 59-A: Comment noted. Thank you for providing information on recreational boating and marine manufacturing industries. BLM has no jurisdiction over surrounding waters and therefore will not regulate boating and fishing activities, except when conducted from monument lands. Limitations on recreational fishing from monument lands are anticipated to result in a negligible impact on coastal economies. Please see MR-1, Jurisdictional Authority.

Response to Comment 59-B: Comment noted. BLM will provide opportunities for the National Marine Manufacturers Association and other interested parties to participate in the ongoing management of the CCNM.

Response to Comment 59-C: Please see MR-1, Jurisdictional Authority.

Response to Comment 59-D: Please see MR-1, Jurisdictional Authority.

Response to Comment 59-E: Please see MR-3, Recreational Access.

Response to Comment 59-F: Please see MR-3, Recreational Access.

Response to Comment 59-G: BLM plans to implement a variety of different management approaches to ensure resource protection on the CCNM, including collaborations, partnerships, outreach, and education. Note that BLM jurisdiction does not extend below mean high tide. See MR-1, Jurisdictional Authority.

Response to Comment 59-H: Please see MR-2, Sensitive Site Characterization.

Response to Comment 59-I: BLM has no jurisdiction over surrounding waters, and therefore will not regulate boating and fishing activities, except when conducted from monument lands. Please see MR-1, Jurisdictional Authority. An evaluation of specific sites will be undertaken to prioritize further management actions under the MOU with DFG and DPR. Please see MR-2, Sensitive Site Characterization.

Response to Comment 59-J: Please see MR-1, Jurisdictional Authority.

Response to Comment 59-K: Although the Proposed RMP will provide the basis for sound management of the CCNM for a 20-year time frame, management will be adaptive to respond to changing human and natural conditions, as well as improvements in knowledge and understanding of coastal systems. Future plan revisions will be conducted in accordance with adopted BLM guidelines for community and stakeholder participation.

Response to Comment 59-L: Please see MR-3, Recreational Access.

Response to Comment 59-M: BLM appreciates additional information regarding boat noise. While evidence relating such noise to marine mammal death may not be available, sub-lethal effects such as flushing of bird colonies have been observed and documented. Note that BLM jurisdiction does not extend to surrounding waters and therefore will not regulate boating activities surrounding the CCNM. See also MR-1, Jurisdictional Authority.

Letter 60 American Sportfishing Association (December 16, 2004)

Response to Comment 60-A: BLM has no jurisdiction over surrounding waters and therefore will not regulate recreational boating and fishing activities, except when conducted from monument lands. Activities conducted on the CCNM will be managed only where necessary to avoid adverse effects on monument resources or to ensure public safety. See MR-1, Jurisdictional Authority.

Response to Comment 60-B: Comment noted. BLM has no jurisdiction over surrounding waters and therefore will not regulate boating and fishing activities, except when conducted from monument lands. Limitations on recreational fishing from monument lands are anticipated to result in a negligible impact on coastal economies. Please see MR-1, Jurisdictional Authority.

Response to Comment 60-C: BLM has no jurisdiction over surrounding waters and therefore will not regulate recreational boating activities, except when conducted from monument lands. See MR-1, Jurisdictional Authority.

Response to Comment 60-D: Please see MR-3, Recreational Access.

Letter 61 Julie Verran (December 16, 2004)

Response to Comment 61-A: Commenter's preference for Alternative B is noted.

Response to Comment 61-B: As stated in the Proposed RMP (Section 2.2.3, under "Research"), BLM will take an active role in promoting and coordinating research on a variety of topics along the California coast, not simply research regarding biological resources.

Response to Comment 61-C: Comment noted. A web site already exists for the CCNM, which will be developed further as management of the CCNM proceeds.

Response to Comment 61-D: Comment noted.

Letter 62 Barbara Stephens (December 16, 2004)

Response to Comment 62-A: Please see MR-1, Jurisdictional Authority.

Response to Comment 62-B: Comment noted. Thank you for providing information on edible seaweed harvesting.

Response to Comment 62-C: BLM is aware of instances where commercial seaweed harvesters have gone ashore on rocks and islands with flightless oystercatcher chicks. BLM is committed to working together through collaborative partnerships with seaweed harvesters to reduce this known impact.

Letter 63 Rising Tide Sea Vegetables (December 16, 2004)

Response to Comment 63-A: Thank you for providing information on seaweed harvesting. However, BLM is aware of instances where commercial seaweed harvesters have gone ashore on rocks and islands with flightless oystercatcher chicks. BLM is committed to working together through collaborative partnerships with seaweed harvesters to reduce this known impact.

Response to Comment 63-B: Please see MR-1, Jurisdictional Authority.

Letter 64 Yurok Tribe (December 29, 2004)

Response to Comment 64-A: Comment noted. Thank you for providing information on the Yurok Tribe's relationship to the lands in the CCNM.

Response to Comment 64-B: Research conducted for the RMP concluded that only four or fewer of the 20 sites provided by the North Coastal Information Center are actually located on the monument.

Response to Comment 64-C: No specific information is given in the Draft RMP/Draft EIS regarding known and recorded cultural resources sites that risks disclosure of confidential information.

Response to Comment 64-D: Comment noted. The Wiyot Tribe (at Table Bluff Reservation), Timbisha Shoshone Tribe, and Yurok Tribe serve as Tribal Historic Preservation Officers within California. Revisions and corrections to the EIS are located in Chapter 4 of this document.

Response to Comment 64-E: Comment noted. As stated in Section 3.8 of the Draft RMP/Draft EIS, no Indian trust resources have been identified on monument lands. Native American requests to practice traditional activities or participate in interpretive activities on the CCNM will be welcomed and will be approved on a case-by-case basis—consistent with the overriding purpose of monument management, which is preservation of the biological, geologic, and cultural resources of the monument.

Response to Comment 64-F: Comment noted. As specific onshore education and interpretation, administrative, and staging areas for the CCNM are identified, BLM will perform additional site-specific analysis as required by NEPA. Participation of the Yurok Tribe would be encouraged where these sites are located in Yurok Ancestral Territory.

Response to Comment 64-G: Comment noted.

Response to Comment 64-H: Please see MR-1, Jurisdictional Authority.

Letter 65 Howard Egan (December 29, 2004)

Response to Comment 65-A: Please see MR-3, Recreational Access.

Response to Comment 65-B: Please see MR-1, Jurisdictional Authority.

Letter 66 Identification Withheld (October 22, 2004)

Response to Comment 66-A: Comment noted. As stated in the RMP (Section 2.3.2, "Key Aspects of the Management Approach"), preservation is the primary management focus for the CCNM.

Response to Comment 66-B: The term "ecosystem," as used in the document, presumes the interactions between water, shoreline, and rocks.

Response to Comment 66-C: Comment noted. However, additional scientific research is necessary to more clearly understand the significance and extent of the resources that the CCNM is intended to protect.

Response to Comment 66-D: Comment noted. Management actions intend to protect terrestrial vegetation, including trees, that inhabit islands and rocks within the CCNM.

Response to Comment 66-E: As stated in the Proposed RMP (OJ-EDU-3), existing state, federal, and local facilities will be utilized to support education and interpretation programs for the CCNM.

Response to Comment 66-F: BLM has no jurisdiction over surrounding waters and therefore will not regulate boating and kayaking activities. However, the Proposed RMP (Section 2.2.3, under "Education and Interpretation") will provide education and outreach to recreationalists and other users along the coast.

Response to Comment 66-G: BLM has no jurisdiction over surrounding waters and therefore will not regulate mussel harvesting, except when divers use monument lands as staging areas. Please see MR-1, Jurisdictional Authority.

Response to Comment 66-H: Comment noted.

Response to Comment 66-I: Oil and gas drilling is prohibited on the monument. BLM also is committed to working with core-managing partners and collaborators to respond quickly and efficiently to oil spills along the coast.

Response to Comment 66-J: Comment noted.

Response to Comment 66-K: The RMP will adequately preserve, protect, and enhance resources of the CCNM through education and collaborative partnerships.

3.6 Responses to Public Meeting Comments

The following sections comprise oral comments received at public meetings conducted for the Draft RMP/Draft EIS, and responses to those comments. Master meeting responses (MMRs) are presented for recurring themes in the oral comments. The comments are followed by either direct responses or references to the master meeting responses.

Letter 1 Master Meeting Responses

The following six master meeting responses address the issues of jurisdiction (MMR-1), sensitive sites (MMR-2), recreational access (MMR-3), intertidal species (MMR-4), coordination (MMR-5), and MLPA coordination (MMR-6). Master meeting responses were developed for recurring themes in the oral comments received at the public meetings.

MMR-1, Jurisdiction

BLM received many questions and concerns regarding its span of authority along the California coast, especially as it relates to management actions in the RMP. Please see MR-1, Jurisdictional Authority in Section 3.3 of this chapter. Please see also Section 1.3.2, "Management Boundaries," in Chapter 1 for a listing of agency jurisdictions on and adjacent to the CCNM.

MMR-2, Sensitive Sites

In response to numerous comments regarding the use of the term "sensitive sites" and how sensitivity will be determined, BLM has included a process in this RMP for establishing sensitivity criteria (see Section 2.3.3, "Plan Implementation Priorities," in the Proposed RMP). Please see also MR-2, Sensitive Site Characterization in Section 3.3 of this chapter.

MMR-3, Recreation Access

The most prevalent oral comment on the Draft RMP related to how the plan would affect recreational fishing and other forms of recreation on and adjacent to the coastal rocks and islands. Please see MR-3, Recreational Access in Section 3.3 of this chapter. Please see also Section 2.2.3, under "Recreation" in Chapter 2 of this document for management actions addressing recreation.

MMR-4, Intertidal Species

Several commenters were concerned about the effect RMP actions might have on the harvest of sea palms and other intertidal species. Please see MR-1, Jurisdictional Authority in Section 3.3 of this chapter. Please see also Section 1.3.2, "Management Boundaries," in Chapter 1 for a listing of agency jurisdictions on and adjacent to the CCNM. The harvest of intertidal and subtidal plant and animal species along the California coast is regulated primarily by DFG, a core-managing partner of the CCNM. This responsibility will remain with DFG; however, this plan includes a provision that precludes the commercial harvest of intertidal species on the monument (Section 2.2.3, under "Land Use Authorizations" in Chapter 2 of this document). This restriction is consistent with the California Code of Regulations, Title 14, which precludes take of species within an ecological reserve (see Appendix C).

MMR-5, Coordination

Several individuals attending the public meetings on the Draft RMP/Draft EIS asked about their ability to participate in BLM's partnership programs. Questions were asked about the roles of the various partnership categories and why these partnerships were needed. The partnership program proposed in the RMP is described in detail in Section 2.3.2, "Key Aspects of the Management Approach," in Chapter 2 of this document. BLM believes that partnerships are needed to meet the many goals of the RMP, given the funding available to BLM to meet its management obligations. Persons or organizations wishing to inquire about coordination and partnership opportunities can contact the CCNM Manager, Rick Hanks, at (831) 372-6115, or via e-mail at hhanks@.blm .gov.

MMR-6, Marine Life Protection Act Coordination

References in the Draft RMP to coordination with DFG's Marine Life Protection Act (MLPA) process raised concerns by a number of meeting attendees. Individuals asked whether this coordination would lead to the establishment of more marine reserves or buffer zones along the coast. Others felt that coordination would allow for MLPA participants to become involved in CCNM management. BLM believes it is imperative that its staff participate with DFG in the MLPA process, so that the policies and management actions associated with the CCNM are consistent with the goals of the State as it implements the requirements of the MLPA. BLM participation will not directly affect the numbers of preserves developed along the coast and it will not cause buffers to be developed around the CCNM rocks and islands. The process for developing protective management strategies for important species along the coast is described in Section 2.2.2, under "Wildlife Resources" in Chapter 2 of this document.

Letter 2 Individual Responses to Oral Comments

The following represents summaries of all oral comments received at public meetings conducted for the Draft RMP/Draft EIS. The comments are organized in the sequence they were received at the seven different meeting locations. The comments are followed by either direct responses or references to the master meeting responses above.

Public Meeting 1

Location: **Moss Landing Marine Laboratories, Moss Landing, CA**
Date & Time: **Thursday, October 14, 2004 (7:00 p.m. to 9:00 p.m.)**

COMMENT SUMMARY AND RESPONSES

1-1 Concern that the preferred alternative could lead to restrictions on fishing boat travel within the monument area, resulting in BLM having "de facto" jurisdiction over recreational fishing.

- Please see MMR-1, Jurisdiction.

1-2 Assertions that there are no threats to the rocks and islands of the monument, and therefore no need for new protections.

- The Presidential Proclamation establishing the CCNM was developed in response to existing and anticipated future threats to the long-term viability of California's coastal rocks and islands as habitat for biological resources and examples of unique geologic and visual resources. These threats are associated with the high level of human activity that occurs along the coast.

1-3 Recreational fishing is a "valid existing right" that must be recognized in the CCNM Draft RMP/Draft EIS.

- Please see MMR-3, Recreation Access.

1-4 Language limiting monument recreation to "appreciating from afar" could limit fishing boat access near the monument rocks and islands, restricting fishing access.

- Please see MMR-3, Recreation Access.

1-5 Fishermen need access near the rocks and islands; they are productive areas.

- Please see MMR-3, Recreation Access.

1-6 Recreational fishing should be an allowable low-impact activity.

- Please see MMR-3, Recreation Access.

1-7 Questions about the activities that threaten rocks and islands, and one suggestion that BLM provide a specific list of these activities.

- A list of activities that BLM intends to exclude on the CCNM because of their threat to resources is included in Chapter 2 (Section 2.2.3, under "Recreation") of this document.

1-8 Draft RMP/Draft EIS is fatally flawed, and the planning process should start over with an improved public scoping process.

- BLM has undertaken a very open and inclusive public involvement program during the course of preparing the CCNM RMP and EIS. The program is described in detail in Chapter 5 of this document.

1-9 BLM should clarify the meaning of "enjoy from afar."

- The term "enjoy from afar" has been removed from the RMP because it is subject to multiple interpretations. BLM intends to focus its recreation management actions on those activities with little or no potential impact on the CCNM resources (activities that occur primarily on the mainland adjacent to CCNM rocks and islands).

1-10 An increase in active management of the rocks and islands might actually result in adverse impacts on the plant and animal habitats that the monument seeks to protect.

- Comment noted.

1-11 Objections to seasonal restrictions on access to rocks and islands, even if imposed out of concern for nesting seabirds, because of the concern that access limitations near the rocks and islands could constitute a restriction on recreational fishing.

- Please see MMR-3, Recreation Access.

1-12 The plan and monument proclamation do not clearly define "reef." Audience members noted that they define reefs as being submerged at all times (while the monument has jurisdiction over features above mean high tide).

- The term "exposed reef" as used in the Presidential Proclamation was intended to refer to those portions of chains of submerged rocks that extend above mean high tide.

1-13 Questions about what BLM will contribute to management of the rocks and islands (and coastal ecosystems) that other agencies and organizations are not already contributing.

- Please see MMR-1, Jurisdiction.

1-14 Discussion of the Draft RMP should not be limited to BLM's role, even though BLM is the agency developing the management plan. Because management of the CCNM will depend heavily on partnerships, all discussions of the draft should focus on the roles of all partners.

- Please see MMR-1, Jurisdiction.

1-15 Question about the source of scientific information used in the Draft RMP/Draft EIS and about the sources of science and research for future management of the monument.

- Sources of information used in EIS analysis are included in Chapter 7, "References" of the Draft RMP/Draft EIS document.

1-16 Question about how the monument will encourage scientific research.

- BLM will encourage scientific research that addresses resource distribution, condition, sensitivity, threats, and trends related to monument lands. Such research will allow managers to focus their efforts to the greatest benefit of resource conservation.

1-17 Question about how the site characterization would be completed.

- The site characterization is being prepared by BLM CCNM staff, with support from partner agencies and organizations, as funding is available.

1-18 Appreciate the opportunity to participate in an active – not reactive – way in the planning process.

- Comment noted and appreciated.

1-19 Concerns about language in the preferred alternative being vague and open to interpretation; language needs to be specific about vision and intent, especially in the area of access for recreational fishing.

- Please see MMR-3, Recreation Access. The CCNM RMP is intended to be a framework plan that will guide future specific management actions as more is known about the resources of the CCNM. The language in the plan is sufficiently specific to give direction to BLM, DPR, and DFG staff as they continue to meet their management responsibilities along the coast. The mission statement, vision, and goals of the plan are clearly stated in Section 1.2, "Overall Vision," in Chapter 1 of this document.

1-20 The Executive Summary does not paint a clear picture of the differences among the Draft RMP/Draft EIS alternatives.

- The Executive Summary contained in this Proposed RMP/Final EIS has been modified to more clearly identify the differences in management emphasis intended with the alternatives.

Public Meeting 2

Location: **Point Arena City Hall, Point Arena, CA**
Date & Time: **Tuesday, October 19, 2004 (7:00 p.m. to 9:00 p.m.)**

COMMENT SUMMARY AND RESPONSES

2-1 Questions asked about the impacts of seaweed harvesting on the rocks and islands. Some types of sea plants anchor themselves to the rocks.

- Please see MMR-4, Intertidal Species.

2-2 Native American tribes have a sovereign right to harvest seaweed. Tribal concerns with the potential for changes in DFG regulations covering seaweed harvest.

- The RMP will not affect existing DFG regulation or management of seaweed harvest by Native American groups.

2-3 The Draft RMP/Draft EIS should be specific about seaweed collection. It should pay attention to minimizing collection activities that could damage the environment of the rocks and islands.

- Please see MMR-4, Intertidal Species and MMR-1, Jurisdiction.

2-4 Tide pools could be damaged with increased visitation associated with the monument.

- Please see MMR-4, Intertidal Species.

2-5 How does the Draft RMP address collection of rocks that wash ashore?

- BLM does not have jurisdiction to regulate collection of rocks that wash ashore along the California coast, unless the rocks are present on CCNM lands above mean high tide. As stated in the RMP (Section 2.2.3, under "Recreation"), removal of any feature from the CCNM is not allowed.

2-6 The Draft RMP should take into consideration the fact that sea palm does not grow everywhere.

- Please see MMR-4, Intertidal Species.

2-7 DFG should close abalone harvesting for 4 years statewide to allow populations to recover.

- Comment noted. The RMP does not affect regulation of abalone harvesting.

2-8 Will permits be required for scientific research and testing? Will information gathered in this research be publicly available?

- Yes, permits are required and information is publicly available through the research institution.

2-9 Does BLM have jurisdiction on activities below mean high tide that would affect birds and mammals that use the rocks and islands?

- BLM does not have direct jurisdiction, but issues can be addressed in working with CCNM partners.

2-10 Would scientists be allowed to study earthquake faults on monument features above mean high tide?

- Research will be allowed when it does not have the potential to adversely affect CCNM resources.

2-11 Can the monument protect against offshore oil drilling?

- The CCNM Presidential Proclamation states that the establishment of the monument does not affect oil and gas leasing off of the monument; however, agencies that do regulate oil and gas leasing along the California coast must consider potential impacts on the monument prior to making decisions on lease requests.

2-12 Can the monument prohibit new leasing in U.S. waters?

- No, but all mineral entry is prohibited on CCNM's rocks and islands.

2-13 Does the Draft EIS consider the impacts of offshore drilling?

- No, CCNM management will not affect offshore drilling. The U.S. Minerals Management Service is responsible for federal off-shore leasing.

2-14 Will DFG continue to regulate seaweed harvest in the monument area?

- Yes, DFG will continue in its regulatory role. See also MMR-4, Intertidal Species.

2-15 The Draft RMP should contain more specific/stronger language to encourage that agency review of adjacent activities should consider impacts on the monument.

- Comment noted.

Public Meeting 3

Location: **Greenwood Community Center, Elk, CA**
Date & Time: **Wednesday, October 20, 2004 (7:00 p.m. to 9:00 p.m.)**

COMMENT SUMMARY AND RESPONSES

3-1 Some people in the region are not satisfied with the performance of DFG and DPR in their efforts to protect coastal resources. Question about why BLM has selected these agencies as core-managing partners in the CCNM.

- BLM has long-standing management partnerships with these agencies; DFG and DPR have the authority to manage coastal resources and coastal state properties, which is important to a partnership approach to CCNM management.

3-2 How will the comments received in the Draft RMP be used in development of the final plan and environmental impact statement?

- All comments received from the public and from government agencies have been considered in developing this Proposed RMP/Final EIS. Changes to the documents have been made and responses to comments have been prepared as deemed appropriate by BLM.

3-3 Mendocino County has a new management plan that includes provisions for ocean conservation in a zone extending 3 miles out to sea.

- Comment noted.

3-4 How will CCNM managers address issues important to coastal cities and counties?

- BLM strongly encourages coastal cities and counties to consider establishing collaborative or steward partnerships with the CCNM management so that they can track future implementation actions associated with the RMP. As specific implementation actions are developed and implemented, BLM will contact the local jurisdictions that might be affected by those actions.

3-5 The RMP needs a clear list of definitions.

- Definitions are included in Chapter 8, "Glossary" of this document.

3-6 Will the plan contain a prohibition against harvesting seaweed from among the monument's rocks and islands?

- Please see MMR-4, Intertidal Species.

3-7 What impact will the monument have on local economies? New regulations affecting seaweed harvest could have an impact on local businesses that rely on harvest to survive.

- The RMP will not affect the regulations or management practices of DFG regarding harvest of seaweed. The RMP does contain a land use authorization policy (AU-LUA-3) that prohibits the commercial harvest of plant and animal species from the CCNM, except by permit from BLM. This policy is not expected to substantially affect the economies of coastal communities.

3-8 Recreational fishing should be recognized as a low-impact activity consistent with monument management goals.

- Please see MMR-3, Recreation Access.

3-9 What is the BLM's jurisdiction over activities that occur below mean high tide? How can the BLM regulate activities such as kelp and seaweed harvest and sea kayaking?

- Please see MMR-1, Jurisdiction.

3-10 Concern about the "reserve buffer area" around the rocks and islands referenced in the Draft RMP/Draft EIS. Control of activities in that buffer area by the DFG (or other monument partners) could lead to restrictions on recreational fishing.

- Please see MMR-1, Jurisdiction and MMR-3, Recreation Access.

3-11 Will the RMP protect the area from offshore drilling?

- The Presidential Proclamation creating the CCNM protects the rocks and islands from mineral entry such as oil drilling or sale. The proclamation does not affect offshore oil leases. Existence of the CCNM means that any proposals for offshore drilling along the California coast would need to consider, through the environmental review process, impacts on the CCNM.

3-12 Jones &Stokes is conflicted in the management plan contract with BLM. Jones &Stokes is simultaneously working with Caltrans, who is constructing a highway retaining wall that damages the national monument viewshed.

- Comment noted. BLM does not agree that working for Caltrans on mainland highway issues and BLM on coastal monument issues constitutes a conflict for Jones &Stokes.

3-13 Assertions that the RMP will be protested.

- Comment noted.

3-14 The RMP needs a process to accept non-governmental organizations as monument partners.

- The RMP contains provisions for non-governmental participation in the three levels of monument partnerships. BLM encourages non-governmental support for management of the CCNM.

3-15 What is driving the need for this management plan? Too much visitation? Too much use?

- When national monuments are established and assigned to BLM for management, BLM's planning regulations require development of a management plan and analysis of a range of management alternatives. The Presidential Proclamation identifies the fragile nature of the coastal resources and their need for more coordinated management.

3-16 Suggestion that BLM should choose the No-Action Alternative.

- Comment noted.

3-17 "Sensitive resources" needs to be defined in the draft RMP/Draft EIS.

- Please see MMR-2, Sensitive Sites.

3-18 Questions and concerns about what kinds of uses constitute "appreciating the monument from afar."

- The term "enjoy from afar" has been removed from the RMP because it is subject to multiple interpretations. BLM intends to focus its recreation management actions on those activities that have little or no potential impact on the CCNM resources (activities that occur primarily on the mainland adjacent to CCNM rocks and islands).

3-19 Concerns about what the monument management plan "will keep us from doing" and the types of restrictions that could result from the RMP.

- These kinds of comments are valuable in helping the BLM to craft management plan language that is clear and easily understood. Please see also MMR-3, Recreation Access.

3-20 Some members of the communities want to see some kinds of restrictions and protections put in place.

- Please see MMR-3, Recreation Access.

3-21 Members of the coastal communities all want to be part of the decision making and determinations of the kinds of uses that will be allowed.

- The public involvement component of the CCNM resource management planning process has been designed to receive input from the coastal communities on allowable uses.

Individuals living along the coast are encouraged to continue to follow the planning process and provide input to the CCNM managers.

3-22 The RMP needs to consider ways to conserve and protect plant communities.

- The RMP actions identified in Section 2.2.2, under "Vegetation" in Chapter 2 of this document are designed to conserve and protect the plant communities of the CCNM.

3-23 CFGC sets fishing regulations. It should be considered as a monument partner.

- BLM is receptive to developing partnerships with all agencies that have regulatory authority along California's coast.

3-24 Who would have the regulatory authority to control boat transit near the rocks and islands?

- Please see MMR-1, Jurisdiction.

3-25 Effective management depends on funding. Will the federal government, through the monument, be able to provide funding for management partners?

- BLM cannot predict the availability of funding to support partner efforts on CCNM management. Current funding is extremely limited.

3-26 Will the monument work with the California Coastal Commission on protection of visual resources?

- BLM intends to have an active partnership with the California Coastal Commission to coordinate resource protection along the coast.

3-27 The CCNM approach to using partnerships is good and creative. Expand it.

- BLM intends to expand its partnerships as funds are available and partners identify an interest in CCNM management.

3-28 Biggest potential threat to the monument is an oil spill. The RMP should assess the threat of an oil spill, and contain a contingency clean up plan.

- BLM is committed to working with core-managing partners and collaborators to respond quickly and efficiently to oil spills along the coast.

3-29 Can people who have lived and worked for years along the coast become stewardship partners?

- Please see MMR-5, Coordination.

3-30 The City of Fort Bragg will soon own a mile of oceanfront. There are partnership opportunities between the city and the monument.

- Comment noted.

3-31 Stewardship partners could work through other monument core-managing partners such as the DFG or DPR.

- Please see MMR-5, Coordination.

3-32 There is "de-facto" protective buffer around the rocks. The bird guano on the rocks will keep people away (fearful of being "bombed") and the sharp, jagged rocks will keep boaters away.

- Comment noted.

3-33 Strengthen local partnerships.

- Please see MMR-5, Coordination.

3-34 The rocks and islands are federal land. They are "our" rocks and islands.

- Comment noted.

Public Meeting 4

Location: Trinidad City Hall, Trinidad, CA
Date & Time: Thursday, October 21, 2004 (7:00 p.m. to 9:00 p.m.)

COMMENT SUMMARY AND RESPONSES

4-1 Questions about the history and driving force behind the presidential proclamation creating the monument.

- The Presidential Proclamation was encouraged by federal and state government representatives who were concerned about the fragile nature of California's coastal resources and the increasing pressure on these resources from a rapidly increasing California population.

4-2 NPS should have been included as a collaborating partner.

- BLM supports the development of a cooperating partner relationship with NPS along the California coast.

4-3 Concern that the monument will lead to more marine preserves. References to buffer zones cause this concern.

- Please see MMR-6, Marine Life Protection Act Coordination.

4-4 More government involvement (in management) is threatening.

- BLM's increasing involvement in coastal resource management is intended to protect those resources for public enjoyment and not to unduly restrict public use of the coast.

4-5 Federal management could replace state and local control over use of the area.

- Please see MMR-1, Jurisdiction.

4-6 Establishment of the monument will lead to more future restrictions on use.

- Please see MMR-3, Recreation Access.

4-7 It is important for members of the public to raise concerns early. That's why (Trinidad participants) are raising concerns now.

- BLM's public involvement program encourages early public involvement in the RMP planning process.

4-8 Does the BLM have the responsibility for all federal land in the United States?

- No. The responsibilities of other federal land managing agencies were described at the public meeting.

4-9 Tax dollars would be better spent protecting the United States southern border. The rocks and islands will protect themselves.

- Comment noted.

4-10 The RMP needs to clearly define "low impact recreation" and "appreciate from afar."

- The terms "enjoy from afar" and "low impact recreation" have been removed from the RMP because they are subject to multiple interpretations. BLM intends to focus its recreation management actions on those activities that have little or no potential impact on the CCNM resources (activities that occur primarily on the mainland adjacent to CCNM rocks and islands).

4-11 Recreational anglers are concerned that "appreciate from afar" could create "no entry zones," restricting their access to fishing.

- Please see MMR-3, Recreation Access.

4-12 How can an individual become a collaborative partner?

- Please see MMR-5, Coordination.

4-13 The CCNM could have a big impact on the community. The community did not have enough input into the process used to develop the Draft RMP.

- BLM has conducted two series of public meetings in coastal communities to learn about local concerns and provide citizens the opportunity to participate in the RMP planning process. Commenter's opinion on the adequacy of these opportunities is noted. BLM encourages continued community involvement in management implementation decisions.

4-14 How much will this cost?

- BLM will develop specific implementation cost estimates once the RMP has been approved by the State Director. Implementation actions will be limited by available funds.

4-15 Concern that the effort to protect marine animals on the rocks and islands will trigger DFG to create "buffer zones."

- Please see MMR-2, Sensitive Sites.

4-16 Concern that confidential cultural resource information has been included in the Draft RMP, and should be removed.

- The cultural resource information contained in the Draft RMP/Draft EIS was not sufficiently specific to endanger individual resource sites. This information has been excluded from the Proposed RMP/Final EIS.

4-17 Are there only four cultural resource sites in the monument, as described in the Draft RMP?

- There are likely to be more than four cultural resource sites on the CCNM, but a review of site information received from the regional information centers identified only four.

4-18 Questions about the timeline and the next steps toward developing the RMP.

- The next steps toward the Proposed RMP/Final EIS were identified at the public meeting. These steps include issuance of a Record of Decision and an allowance for filing of protests.

4-19 Will "Marine Life Protection Act Coordination" mean that the CCNM will establish more buffer zones for protection of marine mammals?

- Please see MMR-6, Marine Life Protection Act Coordination.

4-20 What does "coordination with the California Department of Fish and Game" mean?

- BLM intends to participate in the Marine Life Protection Act (MLPA) process to insure that its actions on the CCNM do not conflict with DFG actions and regulations that result from the MLPA planning process.

4-21 Questions about land exchanges.

- At the public meeting, BLM staff clarified that the presidential proclamation creating the CCNM does not allow for sale or other disposition of the rocks and islands other than by exchange, but only if it furthers the protective purposes of the monument.

4-22 Does the DFG have any plans regarding management of areas above mean high tide?

- Please see MMR-1, Jurisdiction.

4-23 There are 1,100 miles of coastline. Much of the monument is inaccessible. Only 10 percent is accessible.

- Comment noted.

4-24 Lack of detail and specific information in the Draft RMP.

- The RMP is intended to be a framework plan that will guide future specific management actions as more is known about the resources of the CCNM. The language in the plan is sufficiently specific to give direction to BLM, DPR and DFG staff as they continue to meet their management responsibilities along the coast.

4-25 Clarify information about three-mile and 12-mile jurisdictions off shore.

- Please see MMR-1, Jurisdiction.

4-26 What happens in the event of an oil spill?

- BLM is a member of the joint state/federal government oil spill response team in California and will take action to protect coastal resources in the event of a spill.

4-27 BLM has been given a tremendous amount of power to govern without public input.

- BLM has conducted two series of public meetings in coastal communities to learn about local concerns and provide citizens the opportunity to participate in the RMP planning process. The Draft RMP/Draft EIS has also been circulated for public review as a printed report and an electronic file on the CCNM web site (http://www.ca.blm.gov/pa/coastal_monument). Commenter's opinion on the adequacy of these opportunities is noted. BLM encourages continued community involvement in management implementation decisions.

4-28 The RMP should be specific about how objectives will be achieved and how management decisions will be made and implemented.

- BLM resource management plans offer broad management guidance. Future specific management actions will be described in separate management plans (activity level plans). These plans will be shared with the public and will be subject to environmental review through the NEPA process, which has a public involvement component.

4-29 What is DFG contributing to the CCNM partnership?

- DFG continues to be a core-managing partner with BLM. Its role continues to be associated with management and protection of the fish and wildlife that occupy CCNM rocks and islands and the waters that surround the monument. DFG has been contributing its staff resources to participate in the CCNM RMP planning process.

4-30 Anglers are concerned with limits being established on where they can travel on the water.

- Please see MMR-3, Recreation Access.

4-31 DFG representatives who can answer questions should be present at public meetings.

- DFG staff was present at most of the CCNM public meetings. Commenter's opinion regarding their ability to respond to questions is noted.

4-32 Concern that if a species of concern begins using a rock or island, fishermen could lose access to the waters around that rock or island.

- Please see MMR-3, Recreation Access.

4-33 The RMP should look at different protection approaches for different areas.

- The RMP allows BLM to be flexible in its management practices. Different management tools can be used in different portions of the CCNM, depending on specific resource conditions and levels and types of human activity.

4-34 There are people who can find something (of concern) on every rock and island. Fisherman will continue to lose more and more access over the years.

- Please see MMR-3, Recreation Access.

4-35 Can the DFG make fishing regulations through the CCNM?

- DFG's process for establishing fishing regulations along the coast is not altered by the RMP.

4-36 The proposal for recreation site development (page 2-49) on Trinidad's scenic drive south of the Trinidad Ranchería Casino would create traffic congestion. The road is already a problem due to slumping, potholes, and increased casino traffic.

- BLM will not initiate specific actions without first conferring with local governments and residents, and considering the potential effects of those specific actions. Any plans for specific recreation site development would be preceded by local contacts and a NEPA review.

4-37 The plan alternatives need definitions about allowable activities—sailing? kayaking?

- The plan alternatives were program-level concepts and did not propose specific recreation activity inclusions or exclusions, except for those described for Alternative A in Section 2.4.3, under "Recreation", of Chapter 2 of the Draft RMP/Draft EIS. The other action alternatives varied from Alternative A in the priority placed on allocation of staff time and resources toward promoting recreation activity along the coast.

4-38 Commenters need to suggest elimination of plan language that they don't like.

- Comment noted.

4-39 Who makes the final decision?

- The BLM's California State Director makes the final decision on RMP approval. The BLM national director would make decisions on protests.

4-40 Will notification via the CCNM mailing list continue past EIS development?

- Once the Approved RMP and Record of Decision are completed for the CCNM, BLM will continue to use its contact list as necessary to inform interested parties when specific activity plans or subsequent NEPA actions are undertaken. In the interim, individuals can follow the progress of activities related to the CCNM by checking the monument web site (http://www.ca.blm.gov/pa/coastal_monument).

4-41 There is concern with the DFG being a CCNM partner. They have not "been up front with us" in issues regarding the Marine Life Protection Act. They are "suspect."

- Commenter's opinion of DFG is noted. DFG will continue as one of BLM's core-managing partners for the CCNM.

4-42 Alternative C looks good.

- Commenter's preference for Alternative C is noted.

4-43 Why have local stewards? What do they do?

- Please see MMR-5, Coordination. Also, see Section 2.3.2, under "Partnerships (Collaborative Focus)" of the Draft RMP/Draft EIS for a description of the stewardship role anticipated by BLM. Local stewards can support monument management through monitoring and education/interpretation of resource values.

4-44 Local groups need to establish MOUs with the BLM to be collaborative partners in the monument. This would give local groups the same standing as other groups.

- Please see MMR-5, Coordination.

4-45 Is there a chance the no action alternative would be selected?

- Analysis of a no action alternative is required by NEPA. In the case of CCNM, it would mean managing the rocks and islands under the current MOU in place with DFG and DPR. Selection of this alternative would not be consistent with the guidance given BLM in the Presidential Proclamation establishing the CCNM.

4-46 The RMP should clarify references to the Marine Life Protection Act.

- Please see MMR-6, Marine Life Protection Act Coordination.

4-47 The plan may provide opportunities for the Marine Life Protection Act working group to collaborate on CCNM management.

- Please see MMR-6, Marine Life Protection Act Coordination.

4-48 Concerns with language in Alternative A that appears to suggest limiting kayaking. Are you saying that you don't intend to limit kayaking in Trinidad Harbor?

- There is no intent to directly limit kayaking in Trinidad Harbor. Please see MMR-3, Recreation Access.

4-49 How will BLM implement the plan? We've never seen BLM presence.

- BLM will begin to implement the plan by completing a site characterization, developing specific activity plans as funds are available, and developing additional partnering relationships along the coast. BLM intends to make its presence known along the coast by establishing a number of CCNM portals at existing federal and state facilities. These portals will provide educational and interpretive information regarding CCNM resources.

4-50 Do you intend to prohibit access to specific rocks?

- Please see MMR-3, Recreation Access and MMR-2, Sensitive Sites.

4-51 What is the limit for "low-impact recreation?"

- BLM does not plan to develop a "limit" for low impact recreation. Allowable uses and access to the monument are described in Section 2.2.3, under "Recreation" of this Proposed RMP/Final EIS. See also MMR-3, Recreation Access.

4-52 Alternative A specifically addresses boating restrictions. It needs clarification.

- Please see MMR-3, Recreation Access.

Public Meeting 5

Location: **Scripps Institution of Oceanography, La Jolla, CA**
Date & Time: **Wednesday, October 27, 2004 (7:00 p.m. to 9:00 p.m.)**

COMMENT SUMMARY AND RESPONSES

5-1 What triggered the creation of the CCNM?

- The Presidential Proclamation establishing the CCNM was encouraged by federal and state government representatives who were concerned about the fragile nature of California's coastal resources and the increasing pressure on these resources from a rapidly increasing California population.

5-2 Is there a management issue that needs to be addressed, or is this process a bureaucratic exercise required by regulations?

- The coastal resource management issues that need coordination and attention are described in detail in Chapter 2 of this Proposed RMP/Final EIS.

5-3 The CCNM is already managed under its Ecological Reserve designation [A designation made by the CFGC in 1988]. Is a BLM RMP really necessary? Couldn't the necessary management changes be done through the CFGC or through the previous designation [the California Islands Wildlife Sanctuary established by PLO 6369 in 1990]?

- The Presidential Proclamation establishing the CCNM directs BLM to manage the rocks and islands as a new national monument. FLPMA directs BLM to prepare a resource management plan to guide the management of all federal lands under its jurisdiction. The ecological reserve and wildlife sanctuary designations for the rocks and islands do not provide for a comprehensive, coordinated approach to managing the resources of these lands.

5-4 How far offshore does the Ecological Reserve designation extend? A half-mile or 3 miles?

- The Ecological Reserve designation extends 0.5 mile from the California coastline.

5-5 Did the Area of Critical Environmental Concern (ACEC) designation exist before the Proclamation?

- Yes, the ACEC designation was made by BLM in 1990.

5-6 Will there be an inventory of rocks in the CCNM?

- Next to developing and maintaining partnerships, the top priority for implementing the RMP is to conduct the site characterization study. This study is intended to collect and synthesize all existing information and develop site descriptions for the CCNM, as well as to conduct a detailed field survey of select segments of the CCNM by an interdisciplinary team of university-affiliated scientists.

5-7 What will happen in the event of a dispute over ownership?

- Any land ownership disputes that may arise would be resolved in much the same way as they are resolved in the private real estate sector. When necessary, to support real estate transactions or for administrative purposes, ownership is determined through research of federal or state agency records and through the procurement of appropriate title evidence from commercial sources, such as title companies. This title evidence then is reviewed by DOI solicitors (legal counsel), and legal opinions are provided as needed for management purposes. For BLM purposes, title evidence would comply with U.S. Department of Justice Title Standards. Any need for curative title work, property boundary survey, or land tenure adjustments, would be addressed at the discretion of BLM, in keeping with appropriate legal advice and in compliance with applicable federal laws and regulations.

5-8 Does management extend into the intertidal zone?

- BLM management responsibility under the CCNM only extends into the upper intertidal zone. Management of the remainder of the intertidal zone varies. The California State Lands Commission has jurisdiction from below the mean high tide line out three nautical miles and the U.S. Minerals Management Service has federal jurisdiction below mean high water from three nautical miles to 12 nautical miles offshore, which is the edge of federal territorial waters.

5-9 The CCNM boundary seems disjointed.

- The CCNM boundary may seem disjointed because it is not a continuous land mass; instead, it is a series of rocks and islands that exist along an 1,100-mile coastline.

5-10 Does the CCNM include reefs?

- The CCNM includes all lands along the coast that extend above mean high tide. Some rocks and islands along the coast are exposed portions of rocky reefs.

5-11 Seal Rock in La Jolla is part of the CCNM, i.e., the portion above mean high tide.

- Yes, Seal Rock in La Jolla is part of the CCNM.

5-12 Is an EIS required if the no action alternative is chosen?

- The RMP and EIS are documents required by law that support making the determination as to which management alternative will be chosen. Also, selection of the No Action Alternative would not result in no action being taken. If the No Action Alternative were selected, the existing statutory and regulatory requirements and current management agreements and designations would remain in effect and would be followed. These actions, however, would be taken without the framework of a RMP designed to protect resource values for the public in a rational, consistently applied set of procedures and policies. The development of subsequent, more detailed plans for resources would not likely occur, nor would a coordinated public involvement program be implemented.

5-13 Why not wait to write the RMP until the inventory is complete?

- The RMP provides the CCNM with a framework to ensure that a more comprehensive and efficient inventory of the physical, biological, and cultural dimensions of the CCNM is undertaken (site characterization study). Management guidance on other aspects of resource guidance is needed while the inventory is being completed.

5-14 Is there a requirement to share the results of the inventory with the public?

- The current design of the CCNM site characterization study includes making the results available in a web-based format so that anyone can benefit from the results.

5-15 How will management decisions be made in the future based on the inventory of the CCNM?

- The current intent of the CCNM site characterization study is to use its results to ensure that we are making future decisions based on sound resource information. It will help establish baseline data from which to make future management decisions. The framework for those decisions is contained in this Proposed RMP.

5-16 Are there rocks south of La Jolla?

- Yes, including rocks off of San Diego's Sunset Cliffs City Park on the northwest side of Point Loma.

5-17 Adequate regulation already exists, and there are no big threats. Concern that the CCNM will add another layer of bureaucracy for fishermen and create a potential for further regulation of fishing in the future.

- Please see MMR-1, Jurisdiction.

5-18 What is the benefit of the CCNM to recreationalists?

- The CCNM has been established to ensure that the biological, visual, geologic, and cultural resources supported by the rocks and islands of California's coast are available for the long-term enjoyment of recreationalists.

5-19 The CCNM should focus on coordinating enforcement of existing laws and regulations, not creating new regulations.

- The Proposed RMP provides a set of management actions intended to protect the biological, geologic, and cultural resources of the CCNM. These management actions will be implemented together with DFG, DPR, and other collaborators. BLM plans to manage the monument with the minimum of new regulations, leveraging existing regulations, and use of partnerships to avoid the creation of new layers of bureaucracy.

5-20 Concern about the use of public funds, and therefore supports the No Action Alternative.

- Comment noted.

5-21 Managing an area with multiple management entities can work well.

- Comment noted.

5-22 Decisions that affect the use of boats near the CCNM are a de facto management of fisheries. Therefore, the commenter encourages coordination with the DFG and fishermen in such matters, since fisheries are under their jurisdiction. Then, because DFG's jurisdiction extends below the CCNM, there's an opportunity for seamless management of the entire ecosystem.

- Please see MMR-1, Jurisdiction.

5-23 Doesn't the Presidential Proclamation preclude using the No Action alternative, and if so, why present a No Action alternative if it cannot be adopted?

- Analysis of a no action alternative is required by NEPA. In the case of CCNM, it would mean managing the rocks and islands under the current MOU in place with DFG and DPR. Selection of this alternative would not be consistent with the guidance given BLM in the Presidential Proclamation establishing the CCNM.

5-24 Who approves the RMP?

- BLM's California State Director approves the RMP.

5-25 What happens if an entity destroys a feature of the CCNM?

- Individuals destroying national landmark features are subject to arrest and fines under federal law.

5-26 What is the cost of the Jones &Stokes c ontract?

- The contract between BLM and Jones &Stokes is not relevant to preparation of the RMP or EIS.

5-27 Will BLM manage habitat or wildlife?

- BLM primarily manages wildlife habitat, while the wildlife species are managed by the FWS, NMFS, and DFG. BLM will, however, work in partnership with all three of these agencies regarding the management of both the wildlife and the wildlife habitat associated with the CCNM.

5-28 What is the importance of Table 2-6 if the BLM isn't planning on managing wildlife itself?

- The information of Table 2-6 (moved to Table 3.3-2 for this Final EIS document) applies directly to wildlife habitat.

5-29 How will BLM work with partners? How will decisions be made?

- Please see MMR-5, Coordination.

5-30 Clarify the difference between enforcement and management?

- From BLM's perspective, as it applies to the CCNM, enforcement of federal and state law is a part of management.

5-31 What does the ACEC designation mean in terms of management?

- Maintaining the 1990 ACEC designation does not affect the management of the CCNM because the geographic area and the values being protected are identical. Establishment of the monument elevated the rocks and islands from a regional level of concern to a national level.

Public Meeting 6

Location: **Aquarium of the Pacific, Long Beach, CA**
Date & Time: **Thursday, October 28, 2004 (7:00 p.m. to 9:00 p.m.)**

COMMENT SUMMARY AND RESPONSES

6-1 What triggered the creation of the CCNM?

- The Presidential Proclamation establishing the CCNM was encouraged by federal and state government representatives and California citizens who were concerned about the fragile nature of California's coastal resources and the increasing pressure on these resources from a rapidly increasing California population.

6-2 Under the RMP, what does the phrase "recreation management" mean?

- Recreation management includes a number of BLM or BLM partner actions that encourage or discourage recreation activities on or adjacent to the CCNM. These actions are expected to focus on development and dissemination of education and interpretation materials that will foster an appreciation of CCNM resources.

6-3 Are there opportunities for comment on the Draft RMP/Draft EIS after December 16?

- Comments received after December 16 will be reviewed by BLM, but may not be responded to in writing as will the comments received before December 16.

6-4 Logistically, how can the BLM manage the CCNM with such a small staff? Why not give management responsibility to the state?

- The Presidential Proclamation that established the CCNM directs BLM to act as principal manager of these federal lands. In addition to the CCNM Manager and his small staff, he is provided support from the BLM's California State Office and the five BLM field offices that have the day-to-day management responsibility for their portion of the CCNM. BLM also intends to continue to share management responsibility with its core partners (DFG and DPR) and seek cooperative management support from other partners through collaborative and steward arrangements as described in Chapter 2 of the Proposed RMP.

6-5 Can the federal government share funding with DFG so that they can help with management?

- Mechanisms do exist to allow federal agencies (e.g., BLM) to provide funding to state agencies in order to assist with management of the CCNM. As funds become available, these options and opportunities may be used.

6-6 Commenter is interested in working with the BLM on improving and defining language in the RMP (e.g. "low impact").

- BLM appreciates the interest.

6-7 Site characterization should come first, then consultation with appropriate regulatory agencies to determine management actions.

- Management actions will be reviewed periodically with other trustee and regulatory agencies to reflect the results of the site characterization.

6-8 Use of the term "subjective" with respect to determinations of resource sensitivity is problematic.

- Please see MMR-2, Sensitive Sites.

6-9 Can the RMP explicitly state that fishing is allowed?

- Please see MMR-3, Recreation Access.

6-10 Does the RMP give ability or funding for state agencies to conduct enforcement and education?

- The RMP does not establish funding sources or distribution; it will be used to set funding priorities as the plan is implemented.

6-11 Are there existing threats to CCNM resources?

- There are numerous threats to CCNM resources; most are associated with various recreational and commercial activities that occur along the California coast.

6-12 Are there any concerns related to islands north of San Miguel (i.e., Richardson Rock & Wilson Rock) that could restrict use?

- BLM's management of the CCNM will not impinge on the military's right to train on the water, air and lands surrounding the CCNM. Please see MR-1, Jurisdictional Authority in Section 3.3 of this chapter for further information on the relationship between BLM and the military roles along the California coast.

6-13 Taking inventory of the CCNM resources should be part of Alternative A, not Alternative C.

- A resource inventory will be part of any management alternative selected by BLM.

6-14 Will the RMP institute a federal approval process for Local Coastal Programs and other local plans?

- Establishment of the CCNM will not add a federal approval process to local coastal planning. BLM intends to work cooperatively with local government to insure that local and CCNM planning efforts do not conflict.

6-15 How will the RMP affect local government and how will partnerships be articulated?

- Implementation of the RMP should not have a significant effect on local government. Partnerships can be developed either formally using memoranda of understanding (MOUs) or informally through meetings and exchange of information.

6-16 What will the entrance fee for the CCNM be?

- BLM does not intend to encourage human activity (other than research) on the CCNM; therefore, no fee structure has been developed.

6-17 Is Castle Rock off of San Clemente Island of concern, due to military target practice?

- BLM does not have concerns regarding Castle Rock, as it is too close to the island's runway to allow military target practice.

6-18 How could the RMP affect diving and fishing opportunities around the rocks?

- Please see MMR-3, Recreation Access.

6-19 Is recreation acknowledged as a legitimate use of the CCNM?

- Please see MMR-3, Recreation Access.

6-20 Insert language that would recognize recreation use that does not conflict with resource protection.

- Please see MMR-3, Recreation Access.

6-21 Clarify that BLM does not manage fisheries.

- Please see MMR-1, Jurisdiction.

6-22 With no survey of marine resources, how can BLM develop a plan?

- BLM has compiled readily available information on the resources of the CCNM. The plan is establishing a framework for future management decisions and is based on current knowledge of resources and management issues. Plan policies and implementation strategies can be modified as more is learned about CCNM resources.

Public Meeting 7

Location: **Fort Mason, Golden Gate National Recreational Area, San Francisco, CA**
Date & Time: **Thursday, November 4, 2004 (7:00 p.m. to 9:00 p.m.)**

COMMENT SUMMARY AND RESPONSES

7-1 Why use a "balanced" approach to management when the Presidential Proclamation is about protection?

- The balanced alternative preferred by BLM has resource protection as its main objective. However, the plan avoids making highly restrictive management decisions for all parts of the monument prior to having a better understanding of where critical resources are in need of more protective management actions.

7-2 What are the threats to CCNM resources?

- There are numerous threats to CCNM resources; most are associated with various recreational and commercial activities that occur along the California coast.

7-3 Use targeted protection measures rather than blanket restrictions.

- The preferred management alternative (Alternative A in the Draft RMP/Draft EIS) provides for targeted management actions rather than blanket restrictions.

7-4 Many coastal recreationists coexist with wildlife and observe laws.

- BLM recognizes that not all recreationists and not all types of recreation pose a threat to CCNM resources. The Proposed RMP is not expected to have an effect on lawful recreation activities.

7-5 Use signage to identify sensitive areas of the CCNM.

- BLM's protection, education and interpretation initiatives are expected to involve a variety of informational media, including signs.

7-6 Restrictions around CCNM features will adversely affect recreation activities such as fishing.

- Please see MMR-3, Recreation Access.

7-7 There are known conflicts between kayaks (and other recreational uses) and CCNM wildlife, such as seabirds and pinnipeds.

- BLM recognizes that there are documented cases of conflicts between kayaks and wildlife along the coast.

7-8 Exclusion zones around rocks are necessary.

- Comment noted.

7-9 Are there specific areas that need new regulation?

- BLM has yet to determine whether new regulation will be needed to adequately protect CCNM resources. A large body of federal and state law and regulation already exists that is designed to protect the resources of the coast.

7-10 Lack of funding to support detailed research will lead to "lazy" management and thus blanket regulations.

- The RMP does not promote the development of new blanket regulation to compensate for a lack of funding. New regulation would only be developed if a significant gap in resource protection were found through the early phases of plan implementation.

7-11 The core partners lack funding.

- Comment noted.

7-12 The history of increased regulation of coastal recreation causes heightened concern regarding the management of the CCNM.

- Please see MMR-3, Recreation Access.

7-13 Concern that Alternative A increases access without providing funding for education and enforcement to ensure that resources are not degraded.

- Alternative A does not provide for increased public access to the CCNM. The plan clearly identifies those types of activities that will not be allowed on the monument and discourages human encroachment on the rocks and islands that might adversely affect CCNM resources.

7-14 Give more description of the characteristics of buffers and how the buffers might be encouraged/enforced through partnerships.

- The concept of buffers has not been developed in more detail for the Proposed RMP. Because BLM does not have direct jurisdiction on waters surrounding the CCNM, the RMP directs BLM to coordinate with the agencies that do have the appropriate jurisdiction and responsibility in these areas. Appropriate protection measures will be developed cooperatively as the locations in need of better protection are identified.

7-15 How will the BLM react if partners step outside of their roles or misinterpret the jurisdictional boundaries of the CCNM?

- BLM expects to work in a collaborative and open fashion as its partners develop a clear understanding of their roles and responsibilities for implementing the CCNM RMP. Misinterpretations will be rectified in a non-confrontational manner.

7-16 Are there areas where the BLM will work with/encourage recreation businesses? Concern regarding the increased potential for resource degradation as a result of encouraging such businesses.

- The RMP does not propose that BLM will encourage business enterprises along the coast. BLM anticipates it will provide certain recreation enterprises with educational and interpretive material to foster an appreciation for CCNM resource values.

7-17 Don't create opportunities for harm of CCNM resources.

- BLM does not intend to support activities that could negatively affect coastal resources.

7-18 Explicitly state in the RMP what topics (e.g. fishing, flyovers) aren't being addressed by the BLM, and identify who addresses these issues (e.g. FAA, DFG).

- Please see MMR-1, Jurisdiction.

7-19 The RMP can be an educational opportunity for users of coast. This avoids problems such that restrictions aren't needed.

- The Proposed RMP promotes the use of educational programs as a first step in protection of CCNM resources.

7-20 The demographic profile of coastal users is broad, and not all users understand what activities degrade CCNM resources.

- The Proposed RMP educational program is intended to increase understanding of CCNM resources for all coastal users.

7-21 Kayak manufacturers could provide printed educational materials tagged directly onto their kayaks.

- BLM appreciates the recommendation for transmitting educational material to kayakers.

7-22 Don’t regulate activities that are not harmful (e.g. seals playing with divers or kayakers).

- The Proposed RMP does not include regulation of activities that are not harmful to CCNM resources.

7-23 There is a difference between a seal in the ocean versus a seal at a haul-out.

- Comment noted.

7-24 There are many new haul-out sites now.

- Comment noted.

7-25 The concept of CCNM serving as a vehicle for its partners to use to help with the coordination of joint management efforts along the entire California coast does not come through in the RMP.

- Chapter 2 of the Proposed RMP has been modified to more clearly identify BLM’s interest in coordinating management of coastal resources.

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Chapter 4

Changes and Corrections to the EIS

This chapter presents changes and corrections to the EIS. Text to be deleted from the Draft EIS is shown in ~~strikeout~~, and text that has been inserted is shown in underline. Chapters 2, 3, and 4 in the Draft EIS addressed alternatives, affected environment, and environmental consequences, respectively. Although these chapters are not reprinted in this Proposed RMP/Final EIS, changes to these chapters based on public comment are identified in this chapter.

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Chapter 4
Changes and Corrections to the EIS

Introduction

Comments discussed in Chapter 3 of this Proposed RMP/Final EIS have resulted in revisions to the EIS. Those revisions to chapters and appendices are shown below. Text to be deleted is shown in ~~strikeout~~, and text that has been inserted is shown in underline. Revisions are shown in the order of appearance in the Draft RMP/Draft EIS.

The following terms in the Draft RMP/Draft EIS have been revised as noted below.

Draft RMP/Draft EIS	Proposed RMP/Final EIS
Core managing partner	Core-managing partner
On-island	On-monument
management unit, management sub-unit	sub-unit
special designations	special management
USFWS	FWS
NOAA Fisheries	NMFS

Chapter 2, Alternatives

The Proposed RMP is reprinted in this document as Chapter 2. Changes to other portions of the chapter in the EIS are identified below.

On page 2-14, under "2.3.4 Alternative C (Recreation Opportunity Emphasis)," the last sentence in the last paragraph has been revised as follows:

Alternative C focuses on the provision of active recreation opportunities on and adjacent to the monument wherever it would be protective of resource values. The plan provides for an active interpretation program at selected locations in support of the recreation opportunities. ~~Resource protection focuses on known and suspected sensitive sites.~~

On page 2-15, under "Enforcement and Implementation," the second sentence in the first paragraph has been revised as follows:

Enforcement entities include uniformed BLM law enforcement rangers, DOI special agents, NMFS enforcement officers, DFG game wardens, DPR park rangers, county sheriffs, and state and local police.

On page 2-16, under "Decisions Common to All Action Alternatives," the second bulleted item has been revised as follows:

- Special ~~designations~~ management, and

On page 2-42, under "Cultural Resources—Plan Decisions," the first paragraph has been revised as follows:

Under Alternative B, the plan decisions identified for management of cultural resources would be the same as those described for Alternative A. Additionally, ~~the entire CCNM would be designated as a Cultural Resources Management Zone. A~~all areas would be treated as if they potentially contain cultural resources and would be managed for their information, public, or conservation values consistent with BLM Manual 1623, the FPLMA, and the NHPA.

On page 2-45, under "Education and Interpretation—Plan Decisions," the text has been revised as follows:

Under Alternative B, the plan decisions identified for education and interpretation would be the same as those described for Alternative A. A limited number of direct and self-guided ~~points of visitor contact~~ CCNM gateways would be designated at this time, as shown in Table 2-7.

Table 2-7. Initially Designated ~~Points of Contact~~ Gateways in the CCNM under Alternative B

Type of Contact	Location
Direct ~~points of contact~~ gateways (hosted sites)	Piedras Blancas Light Station Point Arena Light Station
Self guided ~~points of contact~~ gateways (unhosted/self-guided sites and wayside exhibits)	Trinidad State Beach and scenic drive Mendocino Headlands State Park Greenwood State Beach Pescadero State Beach Asilomar State Beach and City of Pacific Grove Partington Point (California Department of Transportation) and Julia Pfeiffer Burns State Park Mary Dodds City Park (City of Pismo Beach) Point Vincente fishing access

On page 2-48, under "Wildlife Resources—Plan Decisions," the text has been revised as follows:

Under Alternative C, wildlife resources would be managed as directed in current ESA and MMPA regulations and BLM guidance documents. ~~Additionally, seasonal restrictions (nesting and pupping seasons, as described in Alternative A) would be implemented in areas where known conflicts exist.~~

On page 2-48, under "Wildlife Resources—Implementation Decisions," the text has been revised as follows:

Under Alternative C, implementation activities would include management of wildlife resources as directed in current BLM guidance documents. ~~Additional implementation activities include:~~

- ~~BLM would work cooperatively with DFG, DPR, USFWS, and other agencies to restrict access during nesting and pupping seasons for known sensitive wildlife populations—only on areas where known conflicts exist. Activities on the monument would be restricted during this time.~~

On page 2-50, under "Education and Interpretation—Objectives," the text has been revised as follows:

The objectives for education and interpretation under Alternative C would be the same as those described for Alternative A, except for additional facilities. An additional objective is to:

- Designate new ~~points of public contact~~ CCNM gateways for construction of new education and interpretive facilities.

On pages 2-50 and 2-51, under "Education and Interpretation—Implementation Decisions," the second bulleted item has been revised as follows:

- BLM would designate new ~~points of public contact~~ CCNM gateways for construction of new centralized education and interpretive facilities, potentially in coordination with mainland recreational facilities. Table 2-8 indicates the direct and self-guided ~~points of visitor contact~~ CCNM gateways that would be initially designated under Alternative C.

On page 2-52, Table 2-8 has been revised as follows:

Table 2-8. Initially Designated ~~Points of Contact~~ Gateways in the CCNM under Alternative C

Type of Contact
Direct ~~points of contacts~~ gateways (hosted sites)
Self-guided ~~points of contacts~~ gateways (unhosted/self-guided sites and wayside exhibits)

On page 2-59, the following text has been inserted before the last paragraph, and the last paragraph has been revised as follows:

Regulate Military Activities in the Coastal Area. BLM does not have jurisdiction to regulate activities in the open ocean, airspace, or lands adjacent to the CCNM. Military activities are regulated by other federal agencies, including the U.S. Department of Commerce and FWS.

Regulate the ~~Navy's~~ Use of Sonar in the Coastal Area. BLM does not have jurisdiction to regulate activities ~~in the open ocean~~ off the monument. ~~Naval~~ Sonar activities are regulated by other federal agencies, including the U.S. Department of Commerce and ~~the US~~FWS.

Chapter 3, Affected Environment

Chapter 3 in the Draft RMP/Draft EIS contains 20 sections related to the affected environment. These sections are not reprinted in this document. Revisions to the text are identified below under the corresponding section heading. No changes were made to Sections 3.2, 3.6–3.8, 3.10–3.14, or 3.17–3.18.

Section 3.1 Air Quality

The header in the EIS for Section 3.1 has been changed from "Section 3.7 Health and Safety" to "Section 3.1 Air Quality."

On page 3.1-1, under "3.1.2.1 Environmental Setting," paragraph 3 has been revised as follows:

The project area is also located near various ~~Native American tribal~~ Indian trust lands. Indian trust lands are those areas of land held in trust by the Federal Government and reserved for Indian use, including reservations and individually owned lands. These include: Smith River Ranchería, Elk Valley Reserve, Resighni Reservation, Big Lagoon Ranchería, Trinidad Ranchería, Table Bluff Reservation – Wiyot Tribe, Manchester, Stewards Point Ranchería, and Campo-Manzanita and La Posta Reservation.

Figure 3.1-2 has been revised to correctly identify Santa Cruz Island and Santa Rosa Island. The revised figure is included on the following page.

Section 3.2 Vegetation

On page 3.2-3, under "Regulatory Setting—State," the text has been revised as follows:

In California, the California Environmental Quality Act (CEQA), California Coastal Commission Act, the Porter-Cologne Water Quality Control Act, the Native Plant Protection Act, and CESA have regulatory jurisdiction. ~~Furthermore, the California Fish and Game Code regulates seaweed harvest.~~

The harvest of kelp and other aquatic plants (seaweed) for commercial purposes is regulated by the Fish and Game Commission under the provisions of Title 14, Section 165. Each company or individual engaged in harvesting kelp for commercial purposes must apply annually for a license on forms provided by DFG. Commercial harvest of bull kelp (*Nereocystis*) and giant kelp (*Macrocystis*) is prohibited from kelp beds off Marin, Sonoma, Mendocino, and Humboldt Counties (Section 165[c][5]).

Non-commercial (recreational) take of seaweed also is governed by regulations in Sections 30.00 and 30.10 of Title 14. Although a fishing license is not required to take seaweed, regulations pertaining to bag limits, closed areas, and prohibited species still apply. Sea palm (*Postelsia*) is a prohibited species for non-commercial take.

Section 3.3 Wildlife Resources

At the top of page 3.3-3, under "Birds," the following text has been added:

Table 3.3-2 shows approximate nesting periods for marine birds on the CCNM.

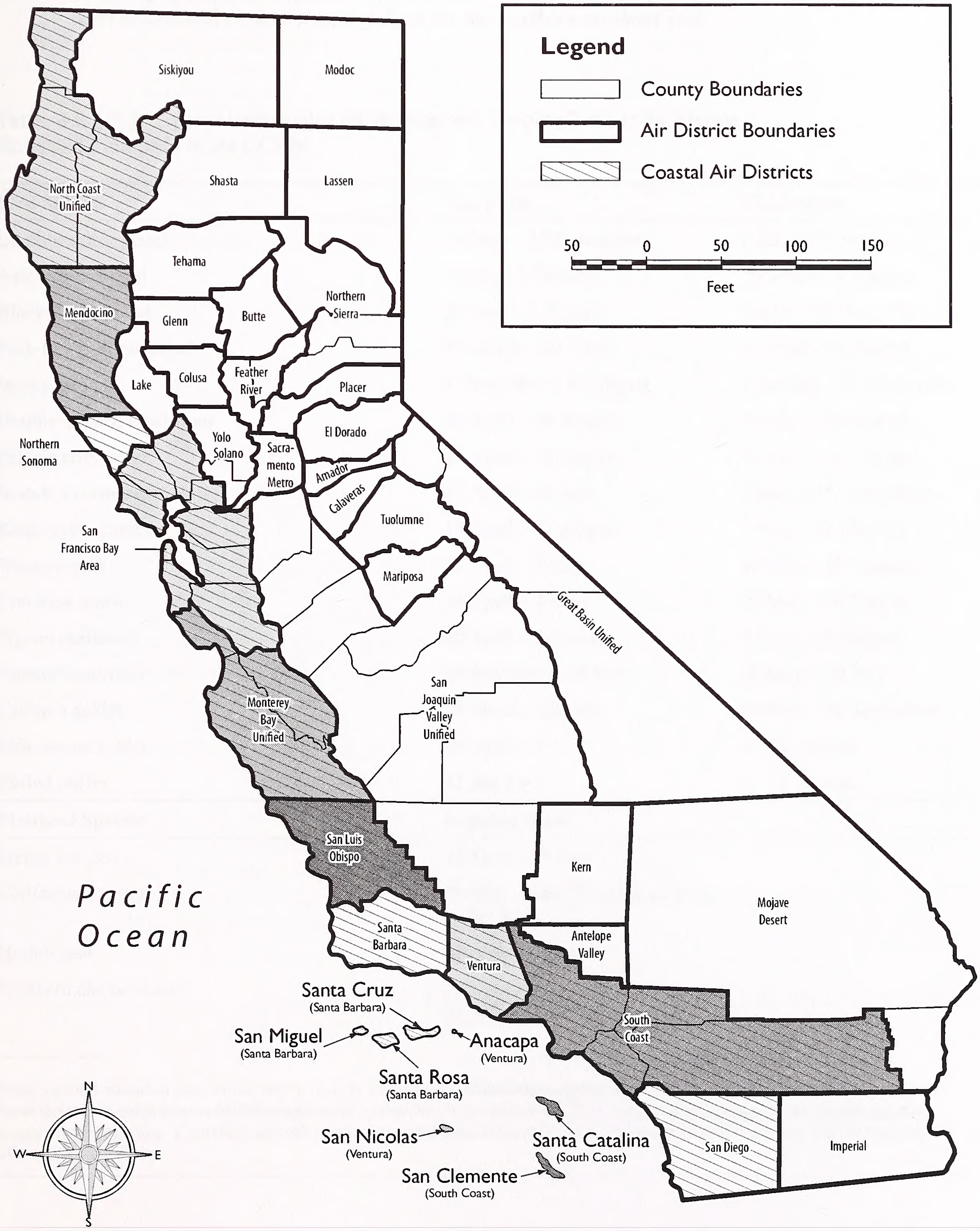
Legend
County Boundaries
Air District Boundaries
Coastal Air Districts
50
0
50
100
150
Feet
Siskiyou
Modoc
Shasta
Lassen
North Coast Unified
Tehama
Glenn
Butte
Northern Sierra
Mendocino
Lake
Colusa
Feather River
Placer
El Dorado
Northern Sonoma
Yolo Solano
Sacra-mento Metro
Amador
Calaveras
Tuolumne
San Francisco Bay Area
Mariposa
Great Basin Unified
Monterey Bay Unified
San Joaquin Valley Unified
San Luis Obispo
Kern
Mojave Desert
Pacific Ocean
Santa Barbara
Antelope Valley
Ventura
South Coast
Santa Cruz (Santa Barbara)
San Miguel (Santa Barbara)
Anacapa (Ventura)
Santa Rosa (Santa Barbara)
San Nicolas (Ventura)
Santa Catalina (South Coast)
San Clemente (South Coast)
San Diego
Imperial
N
W
E
S

Figure 3.1-2
California Air Districts

At the top of page 3.3-3, following the new sentence above, Table 3.3-2 (formerly Table 2-6) has been added with revised pupping dates for the northern elephant seal.

Table ~~2-6~~ 3.3-2. Approximate Dates for Nesting and Pupping Periods for Marine Birds and Pinnipeds in the CCNM

Bird Species	**Egg Dates**	**Chick Dates**
Leach's storm-petrel	10 May – 15 September	2 July – 25 November
Ashy storm-petrel	1 May – 1 October	20 June – 15 January
Black storm-petrel	20 May – 7 August	7 July – 15 November
Fork-tailed storm-petrel	18 March – 21 April	21 June – 15 August
Brown pelican	1 December – 15 August	1 January – 15 September
Double-crested cormorant	20 April – 20 August	20 May – 30 August
Pelagic cormorant	28 April – 30 August	10 June – 25 October
Brandt's cormorant	10 April – 30 July	5 May – 15 September
Black oystercatcher	15 April – 21 August	7 May – 31 October
Western gull	22 April – 7 July	10 May – 27 August
Common murre	26 April – 9 June	22 May – 10 August
Pigeon guillemot	28 April – 3 August	2 June – 30 August
Xantus's murrelet	20 February – 10 June	25 May – 30 July
Cassin's auklet	15 March – 29 July	10 May – 20 September
Rhinoceros auklet	15 April – ?	? – 21 August
Tufted puffin	15 April – ?	? – 21 August
Pinniped Species	**Pupping Dates**	
Steller sea lion	15 May – 15 July	
California sea lion	20 May – July 31; most are born in late June	
Harbor seal	March – August	
Northern elephant seal	15 December – ~~15 January~~ 31 March	

Note: Annual variation may substantially modify these dates. ~~Management options under Alternatives A through C should use these dates as a guide for establishing seasonal restrictions on specific sites~~ These dates will be incorporated into the adaptive management program. Courtship activities and nest establishment take place prior to these dates and are also considered periods of extreme sensitivity.

Pages 3.3-3 and 3.3-4, under "Marine Mammals," have been revised as follows:

Seven marine mammal species regularly use offshore rocks for hauling out or breeding (Table 3.3-~~2~~3). Three of these, the Guadalupe fur seal (*Arctocephalus townsendi*), Steller sea lion (*Eumetopius jubatus*) and sea otter (*Enhydra lutris*), are listed as threatened under ESA. The northern elephant seal (*Mirounga angustirostris*) and sea otter are fully protected species in California.

Table 3.3-~~2~~3. Marine Mammals of the CCNM

Species	Status
Northern fur seal: Eastern Pacific (*Callorhinus ursinus*)	MMPA
Guadalupe fur seal (*Arctocephalus townsendi*)	FT, ST, CFP, MMPA
Steller sea lion (*Eumetopius jubatus*)	FT, MMPA
California sea lion (*Zalophus californianus*)	NA
Harbor seal (*Phoca vitulina*)	NA
Northern elephant seal (*Mirounga angustirostris*)	CFP
Sea otter (*Enhydra lutris*)	FT,CFP, MMPA

Notes:

CFP = California fully protected species.
FT = Federally listed as threatened.
MMPA = Depleted, Marine Mammal Protection Act.
NA = No special status.
ST = State listed as threatened.

Harbor seals (*Phoca vitulina*) and California sea lions (*Zalophus californianus*) are common on many of the rocks along the coast. Both species typically choose sites that are sheltered from disturbance by human activities although, in some areas, the animals have acclimated to chronic human disturbance. Steller sea lions possibly breed on a few of the remote CCNM rocks in northern California. The other species are found primarily on larger islands (fur seal and elephant seal), the mainland (elephant seal), or in the water (sea otter).

Table 3.3-3 shows approximate pupping periods for pinnipeds on the CCNM.

On page 3.3-5, sentences 8 and 9 in the first paragraph under "Fishing" have been revised as follows:

Nesting sites of ~~the~~ pelagic and Brandt's cormorants are distributed the entire length of the state. The most susceptible areas for ~~Brandt's cormorants and~~ common murres are in the northern half of the state.

Page 3.3-6, under "3.3.2.3 Regulatory Setting," has been revised as follows:

Federal

Wildlife resources of the California coast are regulated and protected by numerous laws and agencies, including ESA, the CWA, and the Marine Mammal Protection Act~~, and the Porter-Cologne Water Quality Control Act~~. Under BLM Manual 6840 and California State Office Manual 6840.8, BLM special-status species include federally listed, proposed, and candidate species, and state-listed species. Within BLM, there are no specific field office–level policies for wildlife management in the CCNM, beyond the restrictions stipulated by state and federal regulations for listed species.

State

In California, CEQA, the California Coastal Commission Act, the Porter-Cologne Water Quality Control Act, and CESA have regulatory jurisdiction.

Section 3.4 Cultural Resources

On page 3.4-1, under "3.4.2 Terminology," the second paragraph has been revised as follows:

Historic properties are any prehistoric or historic district, site, building, structure, or object included in—or eligible for listing in—the NRHP. The Keeper of the National Register (NPS) generally makes a determination with consensus between one or more federal agencies and the SHPO. ~~Historic properties are cultural resources that have been determined eligible for listing in the NRHP through consensus between one or more federal agencies and the SHPO.~~ Criteria for evaluating the significance of cultural resources may be found in 36 CFR 60.4 as follows:

On page 3.4-3, the second map entry in Table 3.4-1, has been revised as follows:

Port San ~~Lucas~~ Luis

On page 3.4-3, under "3.4.3.3 Regulatory Setting—Federal," the following sentence has been added at the end of the first paragraph:

In accordance with Section 101(d)(2), Tribal Historic Preservation Officers within California assume the responsibilities of the SHPO for purposes of Section 106 compliance on their tribal lands.

On page 3.4-4, under "3.4.3.3 Regulatory Setting—State," the following paragraph has been added at the end of the section:

BLM recognizes that title to all abandoned shipwrecks and all archaeological sites and historic resources on or in the tide and submerged lands of California are vested in the State. Per California Public Resources Code Sections 6309, 9313, and 6314, SLC has jurisdiction over shipwrecks on the State's tidelands.

Section 3.5 Environmental Justice

On page 3.5-2, under "3.5.2.2 Subsistence Fishing," the following sentence has been added at the end of the second paragraph:

In addition, information from DFG suggests that subsistence fishers often target commercial fish species for ceremonial rituals, consumption, and sale.

On page 3.5-2, under "3.5.2.3 Spiritual and Cultural Appreciation," the last sentence of the paragraph has been revised as follows:

This topic is discussed in more detail in Section 3.~~3~~4, "Cultural Resources."

Section 3.9 Land Use/Lands and Realty

On page 3.9-1, under "3.9.2.1 Environmental Setting—Land Use," the last sentence of the first paragraph has been revised as follows:

Also, ~~although not allowed or legal,~~ some humans use the CCNM for recreation and as sites for harvesting invertebrates during low tides.

On page 3.9-2, under "Lands and Realty," the following sentence has been added at the end of the fourth paragraph:

In addition to the major islands listed above, Orange County has a congressional withdrawal of all rocks off the coast of Orange County that are 2 acres or less and within 1 mile from the shore. These rocks are not part of the CCNM.

Section 3.15 Recreation

On page 3.15-4, under "Coastal Access," the sentence at the end of the second paragraph did not print correctly. The complete sentence is as follows:

Whether people can successfully access the monument by watercraft depends on the presence of boat launch ramps, beach access points, marinas, and sea conditions.

Section 3.16 Research

On page 3.16-1, under "3.16.2.1 Environmental Setting," the fourth sentence of the third paragraph has been revised as follows:

Other coastal land-owning agencies (e.g., DoD, DPR, ~~US~~FWS, and NPS) also issue research permits for activity in their jurisdictions, as does NMFS ~~NOAA Fisheries~~; and DFG issues scientific collecting permits.

On page 3.16-2, Table 3.16-1 has been revised by adding the following entry under "Government Agencies"—after U.S. Minerals Management Service and before National Oceanic and Atmospheric Administration:

U.S. Navy

Section 3.19 Visual Resources

On page 3.19-2, under "3.19.2.1 Environmental Setting—Description of General Visual Character," the first paragraph has been revised as follows:

Some of the most spectacular ocean views in the United States are located along the California coast. The California Coastline encompasses one of the most dramatic landscapes in the world, and the offshore rocks and islands are an integral component of the area's outstanding scenic quality. Protection of the CCNM scenic attributes was a key factor in the area's designation as a national monument. The monument proclamation begins with: "The islands, rocks, and pinnacles of the California Coastal National Monument overwhelm the viewer, as white-capped waves crash into the vertical cliffs or deeply crevassed surge channels and frothy water empties back into the ocean."

The coastal character varies greatly between sunny southern California to the shady forests of the north. Views are defined by qualities including perfect sights of ocean waves breaking on rocky shorelines and cliffs, dozens of historical landmarks like Spanish missions and Spanish settlements, and the opportunities to participate in numerous types of outdoor recreation.

On page 3.19-4, text under "3.19.2.2 Regulatory Setting—Federal" has been revised as follows:

Federal

VRM Management System

~~BLM has developed an analytical process that identifies, sets, and meets objectives for maintaining scenic values and visual quality. The Visual Resource Management (VRM) system functions in two ways. BLM first conducts an inventory that evaluates visual resources on all lands under its jurisdiction (Inventory/Evaluation). Once inventoried and analyzed, lands are assigned relative visual ratings (Management Classifications). Class designations are derived from an analysis of scenic quality (rated by landform, vegetation, water, color, influence of adjacent scenery, scarcity, and cultural modification), a determination of viewer sensitivity levels (sensitivity of people to changes in the landscape), and distance zones (visual quality of a landscape, as well as user reaction, may be magnified or diminished by the visibility of the landscape). Management classes describe the different degrees of modification allowed to the basic elements of the landscape (form, line, color, and texture).~~

~~When a site-specific project is proposed, the degree of contrast between the proposed activity and the existing landscape is measured (contrast rating). The contrast rating process compares the proposed activity with existing conditions element by element (form, line, color, and texture) and feature by feature (land/water surface, vegetation, and structures). The contrast rating is compared to the appropriate management class to determine whether contrasts are acceptable. If the proposed project exceeds the allowable contrast, a BLM decision is made to (1) redesign, (2) abandon or reject, or (3) proceed—but~~

~~with mitigation measures stipulated to reduce critical impacts. The VRM management class objectives are defined as follows:~~

- ~~**Class 1:** Natural ecological changes and very limited management activity are allowed. Any contrast created within the characteristic landscape must not attract attention. This classification is applied to wilderness areas, wild and scenic rivers, and other similar situations.~~
- ~~**Class 2:** Changes in any of the basic elements caused by management activity should not be evident in the characteristic landscape. Contrasts are visible but must not attract attention.~~
- ~~**Class 3:** Changes to the basic elements caused by management activity may be evident but should remain subordinate to the existing landscape.~~
- ~~**Class 4:** Any contrast may attract attention and be a dominant feature of the landscape in terms of scale, but it should repeat the form, line, color, and texture of the characteristic landscape.~~

Existing CCNM Visual Resources Management

~~To date, no VRM inventory has been completed on the CCNM and no VRM classes have been designated. As a result, no specific BLM regulations or management policies currently govern the visual resources of the CCNM. However, present land management and development oversight by the California Coastal Commission, Caltrans, the California Coastal Conservancy, and local counties and cities affect access to visual resources—including both distant and immediate views of the CCNM. Because such a great volume of the viewers and sensitive receptors of CCNM resources are roadway travelers, it is especially important to engage Caltrans in the inventory, planning, and management process.~~

BLM's Visual Resource Management (VRM) system provides a way to identify and evaluate scenic values to determine the appropriate levels of management and protection. It also provides a way to analyze potential visual impacts and apply visual design techniques to ensure that surface-disturbing activities and developments minimize impacts on their surroundings. Assessing scenic values and determining visual impacts can be a subjective process. Objectivity and consistency can be greatly increased by using the basic design elements of form, line, color, and texture—which often have been used to describe and evaluate landscapes—to describe proposed projects. Projects that repeat these design elements are usually in harmony with their surroundings; those that do not create contrast. By adjusting project designs so that these elements are repeated, visual impacts can be minimized.

BLM's VRM system consists of three components:

1. Inventory (establish visual resource inventory classes).
2. Land use allocation (establish VRM classes).
3. Analysis (conduct project-level visual resource contrast rating).

The first two components are completed as part of the RMP process. They were performed on a landscape/area-wide scale and were used to establish a baseline for project-level analysis. The analysis component is a more detailed site-level process that is completed on an as-needed basis as projects are proposed. These phases are described in more detail below.

VRM INVENTORY/MANAGEMENT CLASSES

Each VRM class allows for projects with differing degrees of contrast with the characteristic natural landscape elements of form, line, color, and texture. Higher-numbered classes allow for projects with greater contrast to the landscape.

Class I: The objective of this class is to preserve the landscape’s existing character. This class allows for natural ecological changes and only very limited types of management activities and uses. Any contrasts with the natural landscape must be minimal and not attract attention. This class is reserved for specially designated areas, such as wilderness, or the most highly scenic areas.

Class II: The objective of this class is to retain the landscape’s existing character. The level of change to the characteristic landscape should be low. Management activities and uses can be seen but should not attract the attention of the casual observer. Any changes must repeat the basic elements of form, line, color, and texture in the predominant natural features of the characteristic landscape.

Class III: The objective of this class is to partially retain the landscape’s existing character. The level of change to the characteristic landscape can be moderate. Management activities and uses may attract attention but should not dominate the view of the casual observer. Changes should repeat the basic elements of the predominant natural features of the landscape.

Class IV: The objective of this class is to allow for management activities and uses requiring major modifications to the natural landscape. The level of change to the characteristic landscape can be high. Management activities and uses may dominate the view and be a major focus of viewer attention. However, every attempt should be made to mitigate the impacts of activities through careful location choices and repeating the visual elements of the landscape.

INVENTORY RESULTS FOR THE CCNM

The inventory stage involves identifying the visual resources of an area and assigning them to classes, using BLM’s visual resource inventory process. The process involves rating the relative visual appeal of a tract of land, measuring public concern for scenic quality, and determining whether the tract of land is visible from travel routes or observation points.

Relative Levels of Scenic Quality. Although there is some truth to the statement that “beauty is in the eye of the beholder,” in general, the relative scenic quality of landscapes can be characterized based on their constituent elements of form, line, color and texture. For example, areas with bold forms (the Grand Tetons) or striking color (Bryce Canyon) have a high level of scenic quality. The CCNM rocks and islands are an integral component of a coastal landscape setting of exceptionally high scenic quality. The bold forms and rugged texture of the rocks contrast with the blue Pacific waves. These waves crash on the rocks, creating movement that adds drama and visual excitement to the landscape. An additional unique scenic attribute of the monument is that seaward vistas encompassing monument rocks and the surrounding vast Pacific take in a natural undeveloped setting, even adjacent to urban coastal areas. This increases the importance of the CCNM and surrounding seascape in providing visual open space in urban settings. Typically, even the most scenic planning areas inventoried in an RMP have zones of higher and lower scenic quality. Due to its small acreage and very specific attributes, however, the entire CCNM is characterized as having very high scenic quality.

Level of Viewer Sensitivity to Landscape Changes. The highest viewer sensitivity occurs at popular public use areas such as scenic overlooks, recreation sites, and trail and road corridors. Areas visible from private residences also receive high sensitivity ratings. The entire CCNM is adjacent to very high public use areas, including many federal, state, and local recreation areas and associated scenic viewpoints. Even the CCNM rocks and islands that are not readily visible from shoreline viewpoints are seen by near-shore boat traffic. Therefore, viewer sensitivity for the entire monument is considered high.

Distance of an Area from Points or Corridors of High Viewer Sensitivity. Even minor landscape changes are very evident when viewed in the foreground zone, but these changes become less evident with distance. Changes to landscapes located several miles from points of high viewer sensitivity are often not evident. Almost all of the CCNM is in the foreground or middleground distance zone. State Highway 1 and U. S. 101 border much of the immediate coastline; and parks, scenic overlooks and other locations of high viewer sensitivity are located along the entire coastline.

The results of the visual resource inventory become an important component of BLM's RMP for the area. The RMP establishes how the public lands will be used and allocated for different purposes, and the plan is developed through public participation and collaboration. Visual values are considered throughout the RMP process, and the area's visual resources are then assigned to management classes with established objectives. The VRM classes are adjusted if necessary to reflect the resource allocation decisions and management actions proposed in various plan alternatives.

Based on an analysis of the above three factors, the RMP core team found that all monument lands meet VRM Class I inventory standards.

Section 3.20 Water Resources

On page 3.20-1, under "3.20.2.1 Environmental Setting," the first sentence in the second paragraph has been revised as follows:

Pollution of coastal water is a ~~major~~ potential threat to the CCNM.

Section 3.21 Wilderness and Other Special ~~Designations~~ Management

Pages 3.21-1 and 3.21-2, text under "3.21.2.1 Wilderness" has been revised as follows:

~~The rocks and islands of the California coast are not currently designated as wilderness. In 1997 and 1999, legislation was introduced in the U.S. Congress to designate BLM-administered coastal rocks and islands in California as wilderness within the National Wilderness Preservation System, but neither of the bills passed through Congress.~~

~~The FLPMA recognizes that public lands having wilderness characteristics possess unique resource values and will be managed within BLM's multiple-use mandate. As directed in Section 201 of the FLPMA, if lands are found to have wilderness characteristics through assessment, the BLM land use planning process (defined in Section 202 of the FLPMA) is required to address whether it may protect those wilderness characteristics against or with other possible resource values and uses. In that analysis, BLM should consider the quality of the wilderness characteristics and its ability to preserve those characteristics; the prescriptions necessary to protect the specific wilderness characteristics; the presence of other resource values and uses, and the effect of protecting wilderness characteristics on them; the effect of managing for other resource uses on wilderness characteristics; and the contribution that~~

~~protecting lands with wilderness characteristics provides in meeting other resource management goals and objectives in the plan.~~

~~"Wilderness character" is defined as land:~~

~~(1) That has been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable;~~

~~(2) That has outstanding opportunities for solitude or a primitive and unconfined type of recreation;~~

~~(3) With at least 5,000 acres of land or of sufficient size as to make practicable its preservation and use in unimpaired condition; and~~

~~(4) That potentially contains ecological, geological, or other features of scientific, educational, scenic, or historical value.~~

~~To date, the CCNM has not been assessed to determine whether all or portions of the monument possess wilderness character. However, the entire CCNM is likely to fulfill all four criteria, with the possible exception of criterion (3), because total acreage for the CCNM is currently less than 900 acres. The CCNM is not currently managed for wilderness character.~~

Section 603 of FLPMA directed BLM to inventory roadless areas of 5,000 acres or more with wilderness characteristics and to recommend to the President the suitability of such areas for preservation as wilderness. To satisfy this directive, BLM completed a three-step process: (1) an inventory to determine what BLM managed roadless areas have wilderness characteristics and should subsequently be designated and managed as a WSA, (2) a determination of which WSAs or portions thereof are suitable for future Wilderness designation, and (3) a report to Congress recommending which of the suitable areas should be added to the National Wilderness Preservation System. In 1979, as part of the initial inventory to determine which areas should be designated as WSAs, BLM determined that the BLM-managed rocks, islands, exposed reefs, and pinnacles of the CCNM did not meet the 5,000-acre size criteria and therefore would not be designated or managed as WSAs. These results were published in Wilderness: Final Intensive Inventory, Public Lands Administered by California outside the California Desert Conservation Area (1979).

In 1997 and 1999, legislation was introduced in Congress to designate the BLM-administered coastal rocks, islands, exposed reefs, and pinnacles in California as Wilderness to be included within the National Wilderness Preservation System, but neither bills were signed into law.

Even though the BLM-administered rocks, islands, exposed reefs, and pinnacles of the CCNM are not managed as WSAs nor designated as Wilderness, FLPMA recognizes that public lands with wilderness characteristics possess unique resource values, and management of wilderness values is included in its multiple-use mandate. As directed in Section 201 of FLPMA, BLM is required to assess the resources of public lands. Wilderness characteristics are one of many resources considered. Through the BLM land use planning process (defined in Section 202 of FLPMA), BLM addresses whether and how to protect those wilderness characteristics. In that analysis, BLM should consider the following five points: (1) the existence and quality of the wilderness characteristics and BLM's ability to preserve those characteristics; (2) the prescriptions necessary to protect one or more of the wilderness characteristics; (3) the presence of other resource values and uses, and the effect on them of protecting wilderness characteristics; (4) the effect of managing for other resource uses on wilderness characteristics; and (5) the contribution that protecting lands with wilderness characteristics provides in meeting other resource management goals and objectives in the plan.

As defined in the Wilderness Act of 1964, wilderness characteristics are defined as federal lands having:

- Naturalness (i.e., generally appears to to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable),
- Outstanding opportunity for solitude or a primitive and unconfined type of recreation,
- Sufficient size (5,000 acres or of sufficient size as to make practicable its preservation and use in an unimpaired condition), and
- Potential supplemental wilderness values (i.e., ecological, geological, or other feature of scientific, education, scenic, or historical value).

In 2004, as part of the development of this RMP/EIS, the BLM-administered rocks, islands, exposed reefs, and pinnacles of the CCNM were examined to determine whether any or all had these wilderness characteristics. All were found to have, at a minimum, naturalness and supplemental wilderness values. All the rocks, islands, exposed reefs, and pinnacles had minimal apparent human impacts; are surrounded by water, thereby restricting human-induced impacts; and have one or more of the supplemental values. All these values were recognized in the Presidential Proclamation that established the CCNM. Those islands generally over 0.5 acre also had outstanding opportunities for solitude or a primitive and unconfined type of recreation. These types of recreation included hiking, photography, and wildlife viewing.

Some coastal lands adjacent to the CCNM are designated as ~~Wilderness Study Areas~~ WSAs and wilderness areas. Table 3.21-1 shows which coastal lands possess designated wilderness areas or potential wilderness areas.

Table 3.21-1. Areas Containing Designated Wilderness and/or Potential Wilderness in Coastal California

Coastal Area (and Management Agency)	Wilderness Area	Potential Wilderness Area
King Range (U.S. Bureau of Land Management)		✓
Farralon National Wildlife Refuge (U.S. Fish and Wildlife Service)	✓	
Ventana Wilderness (U.S. Forest Service)	✓	
Silver Peak Wilderness (U.S. Forest Service)	✓	

Source: http://www.calwild.org/places.

3.21.2.2 Other Special Designations

In 1990, the California Islands Wildlife Sanctuary was designated by BLM as an ACEC. This designation highlighted the islands' special values and provided additional protection of the resources found on the islands. Daily management of the sanctuary continued to be the responsibility of the DFG as prescribed in the MOU of 1983. This designation is ~~proposed to be lifted~~ maintained under this RMP (see Chapter 2, "Alternatives").

Chapter 4, Environmental Consequences

Chapter 4 in the Draft RMP/Draft EIS contains 22 sections related to environmental consequences. These sections are not reprinted in this document. Revisions to the text are identified below under the corresponding section heading. No changes were made to Sections 4.16 or 4.22.

Section 4.1 Air Quality

On page 4.1-3, under "4.1.3.3 Recreation Management Actions," the first paragraph has been deleted:

~~Use of motorized vehicles, boats, planes, and helicopters along the coast would increase hydrocarbon and ozone precursor emissions from these sources over time, as these uses are expected to increase corresponding to increased population and increased public use of the monument.~~

On page 4.1-5, under "4.1.3.7 Actions with No Reasonably Foreseeable Effects on Air Quality," the second bulleted item has been revised as follows:

- Special ~~Designations~~ Management;

Section 4.2 Vegetation Resources

On page 4.2.1, under "4.2.2 Thresholds for Adverse Effects," the second bulleted list has been revised as follows:

For the purposes of this analysis, an effect on a special-status plant species or habitat was considered adverse if it would result in any of the following:

- Harm or destruction of any federally listed endangered, threatened, or candidate species, or its habitat; ~~or~~
- Harm or destruction of any BLM-sensitive species or CNHP rare species ~~or its habitat.~~—those species that are ***not*** on federal or state lists as endangered, threatened, candidate, or proposed, but are designated by the BLM State Director for special management consideration; or
- Harm, harassment, or destruction of any California Native Plant Society (CNPS)-rare species—those native California species, subspecies or varieties that are rare, threatened, or endangered in California and elsewhere.

Page 4.2.2 has been revised as follows:

4.2.3.2 Visual Resources Management Actions

In general, management of the CCNM for VRM Class ~~II~~ I objectives would benefit vegetation resources due to the preservation element in this class. However, VRM Class ~~II~~ I could allow some minor development on the CCNM that may potentially result in minor habitat loss and disturbance related to building and maintenance of structures. As most rocks and islands in the monument are not suitable for building of structures, this classification likely would not affect vegetation in the monument. In addition, prior to approving any developments on the CCNM consistent with the VRM Class ~~II~~ I objective, further project-specific analysis would be required that would evaluate the potential adverse or beneficial effects of the proposed action. As described in Chapter 2, "Alternatives," BMPs and other mitigations would be applied to offset effects. It is possible that no mitigation would be available to fully offset these effects. However, due to the restrictive standards of the VRM Class I designation, vegetation is expected to experience minor beneficial effects overall.

~~Minor adverse effects could potentially result from development activities under the VRM Class II designation. Effects of future changes to the VRM class designation may be beneficial or adverse. If the VRM class changes to a class with more restrictions on the activities that may occur in the CCNM, the effects are likely to be beneficial. Adverse effects likely would occur if fewer activities were restricted.~~

Conclusions

Alternatives A–C: ~~Indeterminate~~ Minor beneficial effects on vegetation from visual resources management actions.

On page 4.2-3, the fifth sentence in the second full paragraph has been revised as follows:

Alternative B would result in no adverse impact from research activities through its emphasis on remote evaluation.~~.~~

On page 4.2-3, the third sentence in the second paragraph under "4.2.3.4 Cultural Resources Management Actions" has been revised as follows:

~~Designation of the entire CCNM as a Cultural Resources Management Zone~~ Management of the entire CCNM to protect cultural resources under Alternative B would benefit vegetation resources to the greatest extent by treating all areas as if they contain cultural resources, thereby enacting more stringent use controls.

On page 4.2-4, the first sentence in the fourth paragraph under "4.2.3.5 Vegetation Resources Management Actions" has been revised as follows:

Alternative A would result in moderate beneficial effects from restrictions of ~~on-island~~ on-monument activity with potential to adversely affect native vegetation and invasive species management activities through an adaptive management approach.

On page 4.2-5, the first paragraph under "4.2.3.6 Wildlife Resources Management Actions" has been revised as follows:

~~Designation of seasonal restrictions for~~ Adaptive management of areas with ~~sensitive~~ important seabirds, marine mammals, and/or intertidal species would benefit native plant populations in these portions of the monument. ~~Restrictions that p~~ Prohibitions on access during breeding seasons, where needed, would both protect wildlife from disturbance and protect vegetation from trampling.

On page 4.2-5, the fourth paragraph under "4.2.3.6 Wildlife Resources Management Actions" has been revised as follows:

Alternatives A and B would result in beneficial effects by implementing an adaptive management approach ~~on-island recreation restrictions and seasonal restrictions~~ to manage known ~~on~~ areas with important wildlife ~~that may also host sensitive~~ and vegetation; the greater focus on direct management of wildlife under Alternative B would result in correspondingly greater beneficial effects than under Alternative A. Alternatives A and B also would result in beneficial effects by conducting invasive wildlife species management activities. Research activities would result in both beneficial and adverse effects, because disturbance of vegetation may occur incidentally as wildlife research and inventories are conducted. Alternative B would result in fewer benefits from invasive wildlife species control and fewer adverse impacts from research activities through its emphasis on resource protection above all else. Under Alternative C, ~~seasonal restrictions on monument lands where conflicts exist~~ management under existing regulations would benefit wildlife populations and habitats undergoing known disturbance to some degree.

On page 4.2-6, the first sentence in the second paragraph under "4.2.3.7 Recreation Management Actions" has been revised as follows:

Recreational opportunities in ~~and around~~ the CCNM that are offered, sponsored, or partnered by BLM are anticipated to result in minimal effects on vegetation in the monument.

On page 4.2-6, the first sentence in the third paragraph under "4.2.3.7 Recreation Management Actions" has been revised as follows:

Educational programs aimed at educating or certifying entities that offer recreational opportunities within ~~the vicinity of~~ the CCNM would benefit vegetation.

On page 4.2-6, the first sentence in the fifth paragraph under "4.2.3.7 Recreation Management Actions" has been revised as follows:

Upgrading and construction of signs, viewing platforms, or other facilities for use as recreational infrastructures, are not anticipated to result in ~~direct~~ substantial adverse effects on vegetation in the CCNM ~~but could affect local plant populations~~ or at mainland sites where these facilities are constructed.

On page 4.2-6, the first sentence in the sixth paragraph under "4.2.3.7 Recreation Management Actions" has been revised as follows:

All action alternatives would ~~encourage low-impact~~ allow a variety of recreation activities on the monument, but would ~~and~~ prohibit certain forms of ~~on-island~~ on-monument recreation, and would therefore result in moderate beneficial effects on vegetation.

On page 4.2-7, the third sentence in the first paragraph under "4.2.3.8 Education and Interpretation Management Actions" has been revised as follows:

Some short-term adverse effects on mainland and CCNM vegetation could result from the construction of facilities near areas with important plant species.

On page 4.2-9, the first paragraph under "4.2.3.11 Land Use Authorizations" has been revised as follows:

Many forms of land use authorizations have been discussed under the other management categories, such as recreational, educational, and interpretive facilities. Land use authorizations not previously discussed include facility construction, emergency uses of the CCNM (including response to oil spills or hazardous materials releases), filming, special events, and construction and maintenance of aids-to-navigation and communications facilities. To ensure protection of CCNM resources during emergency uses, filming, and special events operations, permits from applicable agencies and compliance with NEPA will be required. Allowing ~~the~~ construction of ~~these~~ facilities may negatively affect vegetation on the CCNM by making rocks temporarily or permanently unavailable as habitat.

On page 4.2-9, under "4.2.3.12 Actions with No Reasonably Foreseeable Effects on Vegetation Resources," the first bulleted item has been revised as follows:

- Special ~~Designations~~ Management, or

Section 4.3 Wildlife Resources

On page 4.3-2, under "4.3.2.2 Special-Status Species and Habitat", the second bulleted item has been revised as follows:

- Harm, harassment, or destruction of any BLM-sensitive species~~, or CNHP rare species, its habitat migration corridors, or breeding areas~~—those species that are ***not*** on federal or state lists as endangered, threatened, candidate, or proposed but are designated by the BLM State Director for special management consideration.

Pages 4.3-2 and 4.3-3, under "4.3.3.2 Visual Resources Management Actions," have been revised as follows:

Managing the CCNM to VRM Class ~~II~~ I standards could potentially allow minor habitat loss and disturbance related to minor building and maintenance of structures within the CCNM. As most rocks and islands within the monument are not suitable for the building of structures, however, this classification likely would not adversely affect wildlife within the monument. In addition, prior to approving any developments on the CCNM consistent with the VRM Class ~~II~~ I objective, further analysis would be required that would evaluate the potential adverse effects of the project-specific action. As described in Chapter 2, "Alternatives," BMPs and other mitigations would be applied to offset effects. Furthermore, due to the restrictive standards of the VRM Class I designation, wildlife is expected to experience minor beneficial effects overall.

~~Minor adverse effects could potentially result from development activities under the VRM Class II designation. Effects of future changes to the VRM class designation may be beneficial or adverse. If the VRM class changes to a class with more restrictions on the activities that may occur in the CCNM, the effects are likely to be beneficial. Adverse effects likely would occur if fewer activities were restricted.~~

Conclusions

Alternatives A–C: Minor ~~adverse~~ beneficial effects on wildlife resources ~~in the near term, and indeterminate effects in the long term,~~ from visual resources management actions.

> *On page 4.3-4, the third sentence in the second paragraph under "4.3.3.4 Cultural Resources Management Actions" has been revised as follows:*

~~Designation of the entire CCNM as a Cultural Resources Management Zone~~ Management of the entire CCNM to protect cultural resources under Alternative B would further benefit wildlife resources by treating all areas as if they contain cultural resources, thereby enacting more stringent use controls.

> *On page 4.3-4, the second sentence in the third paragraph under "4.3.3.4 Cultural Resources Management Actions" has been revised as follows:*

Alternative B would result in the largest beneficial effect through management ~~of the entire monument as a Cultural Resource Management Zone~~ of all cultural resources, reducing disturbance on the entire CCNM.

> *On page 4.3-4, the first sentence in the first paragraph under "4.3.3.5 Vegetation Resources Management Actions" has been revised as follows:*

~~Restricting~~ Management of ~~on-island~~ on-monument activities to benefit important plants and plant communities also would protect wildlife such as seabirds and pinnipeds from human disturbance.

> *On page 4.3-5, the first sentence in the first full paragraph has been revised as follows:*

Alternative A would result in minor beneficial effects on wildlife resources from adaptive management of ~~on-island~~ on-monument activity ~~restrictions~~ and invasive species management.

> *On page 4.3-5, the first three sentences in the first paragraph under "4.3.3.6 Wildlife Resources Management Actions" have been revised as follows:*

~~Designation of seasonal restrictions in areas with sensitive~~ Adaptive management of important seabirds and marine mammal sites would greatly benefit those species within the CCNM. ~~Posted~~ Management of access ~~restrictions~~ during nesting and pupping seasons would help prevent human activities that would harm or harass the species. ~~Other~~ The variety of adaptive management measures discussed in Chapter 2 ~~are also~~ is anticipated to result in beneficial effects on wildlife resources.

> *On page 4.3-5, the first sentence in the third paragraph under "4.3.3.6 Wildlife Resources Management Actions" has been revised as follows:*

Alternatives A and B would result in major beneficial effects on wildlife resources due to implementation of an adaptive management approach that would use a variety of management measures ~~on-island restrictions, seasonal access restrictions, invasive wildlife species control, and specific management for special-status species~~.

On pages 4.3-6 and 4.3-7, text under "4.3.3.7 Recreation Management Actions" has been revised as follows:

As the human population expands, so does the frequency and intensity of recreational activities along the California coast. ~~Unrestricted r~~ Recreation activities, such as seaweed harvesting, scuba diving, foot exploration, and surfing, if improperly conducted, can cause disturbance to breeding and roosting seabirds and breeding or hauled-out pinnipeds. In particular, foot access to islands could negatively affect nesting seabirds, shorebirds (e.g. black oystercatcher), and undocumented populations of seabirds—especially nocturnal or burrowing seabirds. ~~While low levels of water contact recreation do not likely disturb wildlife significantly, areas with high levels of water contact recreation can stress and disturb wildlife in the vicinity, including on nearby rocks and islands. Non-motorized boats such as kayaks can similarly affect wildlife.~~ While many forms of recreational access would be maintained, certain ~~Restricting on-island~~ on-monument activities would be restricted, such as camping, off-highway vehicle use, launching for hang-gliders, and rock climbing, which would benefit wildlife by decreasing or eliminating disturbance to seabirds and marine mammals in these areas.

~~Unrestricted motorized boat use near rocks and islands inhabited by seabirds and marine mammals causes disturbance and stress to these species.~~ Harbor seals are susceptible to human disturbance and generally flush from their haul-out site when approached too closely. Similarly, seabirds and shorebirds inhabiting rocks and islands ~~are~~ may be disturbed and/or ~~may~~ abandon nests and colonies if frequently ~~disturbed~~ bothered. ~~Encouraging state and federal wildlife management agencies to restrict motorboat use during nesting and pupping seasons (see "Wildlife Resources Management Actions" above) could reduce the level of stress and disturbance these vehicles cause to wildlife.~~

~~Aerial disturbance from planes and helicopters is of particular concern for wildlife welfare. Seabirds are especially vulnerable to this type of disturbance. Low flying planes and helicopters can cause an entire colony of seabirds to flush, leaving nests and young vulnerable to predation or exposure. Seals and sea lions are also sensitive to this type of disturbance and also are most vulnerable during the breeding season. Encouraging seasonal restrictions on aerial access within specified distances of the CCNM, and coordination with the FAA on enforcement, would greatly benefit wildlife inhabiting the CCNM.~~

Recreation activities within the monument with no active support from BLM may adversely affect wildlife as a result of direct disturbance. ~~Low-impact l~~ Landside recreation such as wildlife viewing and scenic overlooks could negatively affect nearby breeding and resting sites for seabirds and marine mammals if activities are allowed too close to important populations. These activities also may result in positive effects if contacts with visitors allow a better understanding of potential effects on wildlife within the monument. In areas where wildlife occurs on rocks that are accessible by people during low tide, specific wildlife viewing restrictions would be beneficial. Throughout most of the monument, however, wildlife viewing from the mainland is not likely to affect wildlife inhabiting the nearshore rocks and islands in the CCNM.

Recreational opportunities in ~~and around~~ the CCNM that are offered, sponsored, or partnered by BLM are expected to result in minimal effects on wildlife within the monument. BLM-sponsored or -partnered activities would be managed and staffed by employees knowledgeable about the resources and protective policies of the CCNM; therefore, such programs are not expected to disturb wildlife. Organized recreational activities related to the monument could also provide users with a personal, first-hand experience under the leadership of a guide knowledgeable about the monument and its wildlife.

Educational programs aimed at educating or certifying entities that offer recreational opportunities within the ~~vicinity of the~~ CCNM also would benefit wildlife. Education of recreational program employees regarding resources and protective regulations and guidelines within the monument would help reduce disturbance. Furthermore, such organizations could be helpful in disseminating educational information and materials to the public. Recreational program managers would be knowledgeable about the monument, its wildlife, and the regulations in place to protect its resources.

Actively promoting recreational opportunities in the CCNM, unless within the framework of organized activities offered by BLM or others, may increase use and levels of human disturbance. The ultimate effect of increased publicity would depend on the concomitant increase in educational efforts to reduce disturbance.

Upgrading and construction of signs, viewing platforms, and other facilities for use as recreational infrastructures ~~are not expected to directly affect wildlife within the CCNM, but~~ could affect local wildlife populations on the CCNM or at mainland sites where these facilities are constructed. Chapter 2, "Alternatives," discusses the measures that would be implemented to offset or avoid these potential effects. Any major facilities construction in support of recreation also would require additional project-specific environmental analysis. Indirectly, the educational value of such facilities may result in a beneficial effect on wildlife.

All action alternatives would ~~encourage low-impact~~ allow recreation, but would ~~and~~ prohibit certain forms of ~~on-island~~ on-monument recreation, and therefore would result in moderate beneficial effects on wildlife.

> *On page 4.3-8, the last sentence in the first paragraph under "4.3.3.8 Education and Interpretation Management Actions" has been revised as follows:*

Some short-term adverse effects on wildlife populations could result from the construction of facilities near areas with ~~sensitive~~ important wildlife.

> *On page 4.3-8, the second sentence in the second paragraph under "4.3.3.8 Education and Interpretation Management Actions" has been revised as follows:*

In particular, print media would be greatly beneficial if made readily available to those involved in ~~on-island~~ on-monument recreation activities prone to cause high levels of disturbance ~~(e.g., activities involving motorboats, airplanes, or helicopters)~~.

> *On pages 4.3-8 and 4.3-9, paragraphs 5–7 under "4.3.3.8 Education and Interpretation Management Actions" have been revised as follows:*

Use of direct and self-guided ~~points of contact~~ gateways for the CCNM could cause negative effects if sites chosen too close to important seabird and marine mammal breeding or resting sites increased disturbance or attracted nest predators (i.e., ravens and crows). The potential for wildlife disturbance would be considered in ~~designation~~ identification of these ~~points of contact~~ gateways and associated infrastructure, thus reducing the potential for these adverse effects. The educational resources these facilities would provide may result in beneficial effects on wildlife inhabiting the monument.

Upgrading and construction of signs, kiosks, wayside exhibits, and visitor centers ~~should not directly affect wildlife in the CCNM but~~ could affect local wildlife populations on the CCNM or at mainland sites where these facilities are constructed. Chapter 2, "Alternatives," has identified measures that would be implemented to offset or avoid these effects. Any major facilities construction in support of education and interpretation also would require additional project-specific environmental analysis. Indirectly, the educational value of such facilities may benefit wildlife.

All action alternatives could involve ~~designation~~ identification and use of ~~points of contact~~ CCNM gateways that could adversely affect wildlife if improperly sited or used.

> *On page 4.3-10, the first paragraph under "4.3.3.11 Land Use Authorizations" has been revised as follows:*

Many forms of land use authorizations have been discussed under the other management categories, such as recreational, educational, and interpretive facilities. Land use authorizations not previously discussed include facility construction, emergency uses of the CCNM (including response to oil spills or hazardous materials releases), filming, special events, and construction and maintenance of aids-to-navigation and communications facilities. To ensure protection of CCNM resources during emergency uses, filming, and special events operations, permits from applicable agencies and compliance with NEPA will be required. ~~Land use authorizations not previously discussed include construction and maintenance of aids to navigation and communications facilities.~~ Allowing ~~the~~ construction and maintenance of aids-to-navigation and communication facilities may negatively affect wildlife inhabiting the CCNM by making rocks temporarily or permanently unavailable as habitat.

> *On page 4.3-10, under "4.3.3.12 Actions with No Reasonably Foreseeable Effects on Wildlife Resources," the first bulleted item has been revised as follows:*

- Special ~~Designations~~ Management, or

Section 4.4 Cultural Resources

> *On page 4.4-2, Section 4.4.3.2, "Visual Resources Management Actions," has been revised as follows:*

Managing CCNM areas as VRM Class ~~II~~ I may affect viewsheds or landscapes that contribute to the importance of a historic property or that alter the character of Native American TCPs. The potential for adverse effects would be avoided through consultation, inventory, and evaluation of TCPs in the CCNM and by negotiating access agreements with tribes on a case-by-case basis. Moreover, due to the restrictive standards of the VRM Class I designation, effects on cultural resources would potentially be beneficial overall.

Under all action alternatives, minor beneficial effects on cultural resources would result from CCNM management as VRM Class I. ~~any remaining adverse effects would be minor.~~

Conclusions

Alternatives A–C: Minor ~~adverse~~ beneficial effects on cultural resources from visual resources management actions.

> *On page 4.4-3, the first sentence in the third paragraph under "4.4.3.3 Geologic, Soil, and Paleontologic Management Actions" has been revised as follows:*

Alternatives A and B would result in beneficial effects on cultural resources through restrictions on ~~recreational~~ activities with potential to adversely affect geologic, soil, and paleontologic resources.

On pages 4.4-3 and 4.4-4, the first two paragraphs under "4.4.3.4 Cultural Resources Management Actions" have been revised as follows:

~~Restricting on-island activities on the CCNM~~ Management actions to protect cultural resources would minimize potential for disturbance, theft, or vandalism. Reducing foot and vehicular traffic on the monument's rocks and islands, where needed to protect cultural resources, also would result in a net beneficial effect on cultural resources through reduced potential for soil erosion and subsequent exposure of buried cultural resources.

Preparation of a CRMP and nomination of NRHP-eligible properties for listing would clearly benefit all potentially significant cultural resources through resulting preservation actions. Monitoring and surveillance of cultural resources would ensure that all recreation and ~~seasonal restrictions~~management measures are enforced, thereby producing even greater net beneficial effects. ~~Designation of the entire CCNM as a Cultural Resources Management Zone~~ Management of the entire CCNM to protect all cultural resources under Alternative B would benefit cultural resources to the greatest degree by enacting stringent use controls ~~and offering protection to cultural resources throughout the entire CCNM~~.

On page 4.4-4, the first paragraph under "4.4.3.5 Vegetation Resources Management Actions" has been revised as follows:

Cultural resources may benefit as a result of ~~designating on-island restrictions~~ an adaptive approach to management that would use a variety of management measures within the CCNM in order to protect ~~sensitive~~ important plants and plant communities, to the extent that they restrict disturbance of cultural resources sites.

On page 4.4-5, the first sentence in the first full paragraph has been revised as follows:

Alternatives A and B would result in minor beneficial effects on cultural resources from ~~on-island activity restrictions~~ implementation of a variety of adaptive management measures.

On page 4.4-5, the first two paragraphs under "4.4.3.6 Wildlife Resources Management Actions" have been revised as follows:

Cultural resources would benefit from ~~on-island seasonal~~ an adaptive approach to management and use of a variety of management measures ~~access restrictions~~, to the extent that these restrictions would reduce the potential for disturbance, theft, or vandalism of cultural materials.

An adverse effect may occur if ~~seasonal~~ restrictions are inadvertently applied to NRHP-eligible TCPs where Native Americans have a legitimate and established practice of visiting ancestral sites.

On page 4.4-5, the first sentence in the fourth paragraph under "4.4.3.6 Wildlife Resources Management Actions" has been revised as follows:

Alternatives A and B would result in moderate beneficial effects on cultural resources from wildlife resources management actions by establishing an adaptive approach to management that could implement restrictions, ~~on-island activity restrictions and seasonal use restrictions during known breeding seasons,~~ thereby reducing human trampling.

On page 4.4-6, the first sentence in the first paragraph under "4.4.3.7 Recreation Management Actions" has been revised as follows:

Public access to the CCNM for purposes of recreation, if improperly conducted, has the potential to adversely affect prehistoric and historic archaeological sites, historic buildings and structures, and Native American TCPs through increased exposure, use of site areas, and potential for vandalism.

On page 4.4-6, the first sentence in the second paragraph under "4.4.3.7 Recreation Management Actions" has been revised as follows:

All action alternatives would allow recreation but would potentially restrict ~~some~~ certain~~-on-island~~ on-monument recreational activities with the potential to ~~that could be resulting in~~ damage~~-to~~ cultural resources.

On page 4.4-8, Section 4.4.3.11 has been revised as follows:

4.4.3.11 Actions with No Reasonably Foreseeable ~~Impact~~ Effects on Cultural Resources

~~The following~~ Activities for the following management actions would not adversely affect cultural resources:

- Special ~~Designations~~ Management,

Section 4.5 Environmental Justice

On page 4.5-2, the first two paragraphs under "4.5.3.2 Management Actions for Geologic Soil, and Paleontologic Resources; Cultural Resources; and Vegetation Resources" have been revised as follows:

Although the extent of subsistence collection of food and other materials by disadvantaged communities in the CCNM is unknown, it is likely that these activities ~~only~~ occur only on CCNM features easily accessible from shore (e.g., accessible by foot at low tide). Adaptive management actions ~~Actions restricting access to, or activities on,~~ to manage the CCNM for protection of various resources ~~in this nearshore area~~ could therefore affect subsistence collection to some degree. Depending on the extent of ~~restrictions~~ management measures, numerous areas along the mainland and the CCNM would remain open for these types of activities. As discussed in Chapter 2, "Alternatives," if BLM is notified that an environmental justice community is being adversely affected, further study would be conducted and appropriate measures would be taken to adequately offset or eliminate effects on those disproportionately affected. Coordination with DFG, who is responsible for controlling fishing, hunting, and gathering in coastal waters, also would be conducted.

Alternatives A and B may result in minor adverse effects on disadvantaged communities through ~~restrictions of~~ implementation of adaptive management measures for ~~on-island~~ on-monument activities and potential additional actions developed through management of cultural resources. Alternative B also would involve restrictions on surface-disturbing activities and ~~designation of the entire CCNM as a Cultural Resources Management Zone~~ protection of all resources within the CCNM. These management actions for geologic, soil, and paleontologic; cultural; and vegetation resources are considered to have minor adverse effects on environmental justice. Alternative C would result in no effects related to environmental justice, as disadvantaged communities would continue to have relatively unrestricted access to the CCNM.

On page 4.5-3, the text under "4.5.3.3 Wildlife Resources Management Actions" has been revised as follows:

As discussed in Chapter 2, "Alternatives," the collection of small amounts of seaweed and invertebrates for personal, non-commercial use would still be allowed under the various alternatives; and recreational fishing generally would be allowed. ~~can be caught from boats and mainland areas.~~ These activities would continue to be managed by DFG. Areas subject to ~~seasonal restrictions~~ adaptive management measures have the potential to disproportionately affect low-income and minority populations who use the CCNM and its surrounding environs as a site to conduct subsistence fishing, or who rely on harvesting of non-commercial ocean products (such as seaweed and shellfish) from these areas as a major source of food. ~~It is likely that these subsistence activities would be restricted to areas of the CCNM close to shore.~~ Generally, subsistence activities are thought to occur on the rocks and islands that are close to shore (e.g., accessible by foot at low tide). Locations near the shore do not generally house ~~sensitive~~ important wildlife due to the potential for access by predators and the likelihood of a history of ongoing human disturbance. Therefore, the potential for conflicts between areas subject to ~~seasonal restrictions~~ wildlife management and subsistence activities is relatively low.

~~—~~Alternatives A and B would implement ~~seasonal restrictions around known sensitive wildlife sites during nesting and pupping seasons~~ a variety of adaptive management measures to protect known important wildlife sites; these alternatives likely would not result in large areas that would be closed to subsistence activities, and it is expected that other areas would remain available for these activities.

On page 4.5-3, the text under "4.5.3.4 Recreation Management Actions" has been revised as follows:

~~Restrictions on fishing and/or other species collection, whether restricted by adaptive management measures or not, may have the potential to disproportionately affect low-income and minority populations who rely on subsistence harvesting as a major source of food. However, a~~ As discussed in Chapter 2, "Alternatives," the collection of small amounts of seaweed and invertebrates for personal, non-commercial use would ~~still~~ be allowed under the plan. Also, recreational fishing generally would be allowed ~~can be caught from boats and mainland areas adjacent to~~ on the monument.

All three action alternatives include provisions for subsistence collection and recreational fishing within the CCNM. No adverse effects related to environmental justice from recreation management actions have been identified.

On page 4.5-4, under "4.5.3.6 Actions with No Reasonably Foreseeable Effects Related to Environmental Justice," the second bulleted item has been revised as follows:

- Special ~~Designations~~ Management,

Section 4.6 Geologic and Soil Resources

On page 4.6-2, Section 4.6.3.2, "Visual Resources Management Actions," has been revised as follows:

As part of all action alternatives, BLM would manage the CCNM to VRM Class ~~II~~ I standards ~~until VRM classes are permanently established in the future~~. The Class ~~II~~ I designation may indirectly protect geologic or soil resources of the CCNM by prohibiting activities that may substantially alter the visual quality of the rocks and islands. Prohibited activities are not specified but may potentially include any surface-disturbing activity or any activity that would erode soils and alter the existing views. However, the Class ~~II~~ I designation could allow some minor development to occur in the CCNM. Prior to approving any development, further analysis would be required that would evaluate the potential adverse and beneficial effects of the project-specific action. In the event of adverse effects, BMPs and other mitigation measures that are described in Chapter 2, "Alternatives," would be applied to offset these effects. It is possible that no mitigation would be available to fully offset these effects. However, due to the restrictive standards of the VRM Class I designation, geologic and soils resources are expected to experience minor beneficial effects overall.

~~Minor adverse effects potentially could result from development activities under the VRM Class II designation. Effects of future changes to the VRM class designation may be beneficial or adverse. If the VRM class changes to one with more restrictions on the activities that may occur in the CCNM, then the effects likely would be beneficial. Adverse effects are anticipated if fewer activities were restricted. Prior to any development, project-specific adverse and beneficial effects would be identified. Mitigation would be implemented when possible to minimize potential adverse effects (see Chapter 2, "Alternatives").~~

Conclusions

Alternatives A–C: Minor ~~adverse~~ beneficial effects on geologic and soil resources ~~in the near term, and indeterminate effects in the long term,~~ from visual resources management actions.

On page 4.6-3, the text under "4.6.3.3 Geologic, Soil, and Paleontologic Management Actions" has been revised as follows:

~~Restricting on-island activities~~ Management to protect important geologic, soil, and paleontologic resources on the CCNM generally would result in beneficial effects on geologic and soil resources. Decreased human activities would reduce the potential effects of human-induced erosion caused by trampling, as well as the potential safety risks to humans caused by ground shaking, liquefaction, landslides, fault ruptures, and soil expansion.

~~Further p~~ Prohibiting all surface-disturbing activities (except foot traffic) on the CCNM as under Alternative B would result in even greater beneficial effects on geologic, soil, and paleontologic resources. Eliminating structural development and construction activities on the CCNM would reduce the potential for accelerated runoff, erosion, and sedimentation during construction activities and reduce the potential for structural damage caused by geologic or soil hazards.

Research that seeks to better understand the nature of CCNM soils and geology also would contribute to improved future management actions.

Alternatives A and B would result in beneficial effects on geologic and soil resources through ~~restrictions of on-island activities~~ implementation of a variety of management measures.

On page 4.6-4, the first two paragraphs under "4.6.3.4 Cultural Resources Management Actions" have been revised as follows:

The cultural resources management actions would preserve significant cultural resources by restricting ~~on-island~~ on-monument ~~recreational~~ activities with potential to degrade cultural resources, preparing a CRMP, and nominating NRHP-eligible properties for listing. Such management actions would decrease human-induced soil erosion and activities that could affect geologic and paleontologic resources, such as illegal excavation and collection.

~~Designating the entire CCNM as a Cultural Resources Management Zone~~ Management of the entire CCNM for cultural resource values as under Alternative B would result in major beneficial effects to geologic and soil resources by enacting more stringent use controls throughout the monument. Monitoring and surveillance of cultural resources also would ensure that ~~recreation and seasonal restrictions~~ any access restrictions are enforced, thereby further reducing soil erosion and sedimentation effects.

On page 4.6-4, the last sentence in the first paragraph under "4.6.3.5 Vegetation Resources Management Actions" has been revised as follows:

~~Restricting on-island activities~~ Adaptive management of vegetation resources generally would result in beneficial effects as human-induced erosion is minimized.

On page 4.6-5, the text under "4.6.3.6 Wildlife Resources Management Actions" has been revised as follows:

The primary effect from protection of ~~sensitive~~ important seabird, marine mammal, and/or intertidal species would be reduced human-induced erosion ~~because~~ where management measures reduce access to the CCNM ~~would be seasonally limited~~ at ~~sensitive~~ important sites, according to the tiered adaptive approach to management discussed in Chapter 2. ~~Seasonal restrictions to some of the rocks and islands would reduce human trampling and associated erosion effects.~~ The management approach would implement a variety of measures to optimally protect wildlife resources within the CCNM. Reductions in human use resulting from adaptive management at important sites potentially would reduce human trampling and associated erosion.

Any ground-disturbing activities associated with wildlife management, such as measures to improve habitat or control invasive wildlife species, have the potential to affect geology and soils on the monument. Such activities may result in adverse effects; however, erosion control measures described in Chapter 2, "Alternatives," would be implemented to avoid or offset these effects such that any remaining effects are considered minor.

Alternatives A and B would result in minor beneficial effects on geology and soils from wildlife resources management actions by establishing ~~on-island activity restrictions and seasonal use restrictions during known breeding seasons, thereby reducing human trampling~~ adaptive management measures that would balance protection of wildlife and human uses of the monument.

On pages 4.6-5 and 4.6-6, the first two paragraphs under "4.6.3.7 Recreation Management Actions" have been revised as follows:

Restricting certain ~~on-island~~ on-monument recreational activities, such as camping, off-highway vehicle use, launching for hang-gliders, and rock climbing, would result in beneficial effects on geology and soils. Adverse effects from ~~active support of~~ allowed recreation activities that are improperly conducted would include degradation of soils and geologic resources resulting from human-induced erosion; however, BLM-sponsored activities are anticipated to be conducted in a manner such that ~~sensitive~~ vulnerable soil, geologic, or paleontologic resources are not adversely affected.

Actively engaging in offering, sponsoring, and partnering to provide active recreation opportunities in ~~and around~~ the CCNM is considered potentially adverse because increased recreation activities could degrade geologic and soils resources.

On page 4.6-6, the first sentence in the last paragraph under "4.6.3.7 Recreation Management Actions" has been revised as follows:

~~Because~~ While all action alternatives would ~~restrict~~ allow recreation, certain ~~on-island~~ on-monument recreational activities would be restricted, ~~they~~ and would result in moderate beneficial effects on geologic and soil resources.

On page 4.6-8, the first three sentences in the first paragraph under "4.6.3.11 Land Use Authorizations" have been revised as follows:

Land use authorizations include facility construction, emergency uses of the CCNM (including response to oil spills or hazardous materials releases), filming, special events, and construction and maintenance of aids-to-navigation and communications facilities. To ensure protection of CCNM resources during emergency uses, filming, and special events operations, permits from applicable agencies and compliance with NEPA will be required. ~~Land use authorizations, such as c~~ Construction of aids-to-navigation and communications facilities, could lead to human-induced erosion, accelerated runoff or erosion associated with construction activities, and the risk to humans or structures from geologic or soil hazards.

On page 4.6-8, under "4.6.3.12 Actions with No Reasonably Foreseeable Effects on Geologic and Soil Resources, the first bulleted item has been revised as follows:

- Special ~~Designations~~ Management, or

Section 4.7 Health and Safety

On page 4.7-2, the first sentence in the second paragraph under "4.7.2.2 Management Actions for Geology, Soil, and Paleontologic Resources" has been revised as follows:

Alternatives A and B would result in beneficial effects to public health and safety through restrictions on ~~recreational~~ activities with potential to degrade resources.

On page 4.7-2, the first sentence in the first paragraph under "4.7.2.3 Cultural Resources Management Actions" has been revised as follows:

Under the various alternatives, certain ~~on-island~~ on-monument activities ~~would~~ may be prohibited or limited ~~in an attempt~~ to protect cultural resources on the monument.

On page 4.7-3, the second and third paragraphs under "4.7.2.4 Vegetation Resources Management Actions" have been revised as follows:

Adaptive management of vegetation resources, where it results in reduced public use of ~~Restricting public access to~~ CCNM rocks and islands in order to protect vegetation resources, would decrease the rate of accidents and injuries on the monument. Recreational activities such as fires, off-highway vehicles, and hang gliders would all be prohibited on the CCNM, therefore reducing potential injuries.

Alternatives A and B would result in minor beneficial effects on health and safety through ~~restrictions on~~ implementation of adaptive management measures for ~~on-island activities~~ vegetation management.

On page 4.7-4, the text under "4.7.2.5 Wildlife Resources Management Actions" has been revised as follows:

~~On-island activity restrictions and seasonal use restrictions during breeding seasons would reduce~~ Adaptive management measures that reduce public ~~access to~~ use of CCNM rocks and islands~~, and~~ would ~~therefore decrease the rate of~~ reduce the likelihood of accidents and injuries on the monument.

Alternatives A and B, by implementing adaptive management measures for wildlife ~~designating on-island activity restrictions and seasonal restrictions~~, would result in moderate beneficial effects. Public access to ~~these portions of~~ important wildlife sites on the monument ~~would~~ could be ~~restricted~~ reduced, and the rate of accidents and injuries on the monument ~~would~~ could correspondingly decrease. Under Alternative C, ~~seasonal~~ restrictions on monument lands where known conflicts exist also would reduce public access, though to a lesser degree.

On page 4.7-4, the first two sentences in the first paragraph under "4.7.2.6 Recreation Management Actions" have been revised as follows:

Increasing the number of recreation facilities along the coast likely would draw more visitors to the monument~~, as would increasing~~ and could increase the amount of publicity and other support for various recreational activities. The presence of more visitors, especially visitors actively recreating on and around the monument, ~~would~~ could lead to an increase in the rate of accidents and injuries on monument lands.

On page 4.7-4, the first sentence in the third paragraph under "4.7.2.6 Recreation Management Actions" has been revised as follows:

All action alternatives would ~~restrict~~ prohibit certain ~~on-island~~ recreational activities on the monument that pose a health and safety risk, and would therefore result in moderate beneficial effects on health and safety by decreasing the rate of injury on the monument.

On page 4.7-6, the first sentence under "4.7.2.9 Land Tenure Adjustments" has been revised as follows:

The extent to which land acquisitions may cause health and safety effects depends on previous ownership.

On page 4.7-6, the first paragraph under "4.7.2.10 Land Use Authorizations" has been revised as follows:

Land use authorizations include facility construction, emergency uses of the CCNM (including response to oil spills or hazardous materials releases), filming, special events, and construction and maintenance of aids-to-navigation and communications facilities. To ensure protection of CCNM resources and human health and safety during emergency uses, filming, and special events operations, permits from applicable agencies and compliance with NEPA will be required. Installation of navigational aids and communications facilities may decrease the frequency of accidents involving disoriented boaters.

On page 4.7-7, under "4.7.2.11 Actions with No Reasonably Foreseeable Effects on Health Safety," the second bulleted item has been revised as follows:

- Special ~~Designations~~ Management, or

Section 4.8 Indian Trust Resources

On page 4.8-1, the first paragraph under "4.8.2.1 No Action Alternative" has been revised as follows:

The No Action Alternative would not restrict or change uses allowed on any part of the monument.

No Indian trust resources have been identified thus far on monument lands. There would be no conflict with or effects on Indian trust resources.

On page 4.8-1, the second paragraph under "4.8.2.2 Wildlife Resources Management Actions" has been revised as follows:

Under all alternatives, the tiered approach to management discussed in Chapter 2 would identify and adaptively manage ~~seasonal use restrictions might conflict~~ potential conflicts with uses and rights accorded to Indian trust resources. In addition, as discussed in Chapter 2, "Alternatives," valid existing rights would take precedence over limitations exacted by the management measures. Native American requests to practice traditional activities or participate in interpretive activities on the CCNM will be welcomed and approved on a case-by-case basis—consistent with the overriding purpose of the monument. ~~However, as discussed in Chapter 2, "Alternatives," valid existing rights would take precedence over limitations exacted by the seasonal restrictions.~~

No Indian trust resources have been identified thus far on monument lands. There would be no effect on Indian trust resources from wildlife resources management actions under any alternative.

On page 4.8-2, the first paragraph under "4.8.2.3 Recreation and Education and Interpretation Management Actions" has been revised as follows:

While it is possible that recreational and/or interpretive facilities might be planned for construction on Indian lands, these activities would be conducted with relevant tribes under voluntary partnerships. Therefore, no potential exists for conflicts with Indian trust resources.

No Indian trust resources have been identified thus far on monument lands. There would be no effect from these management actions under any alternative.

On page 4.8-2, under "4.8.2.4 Actions with No Reasonably Foreseeable Effects on Indian Trust Resources," the second bulleted item has been revised as follows:

- Special ~~Designations~~ Management;

Section 4.9 Land Use/Lands and Realty

On page 4.9-2, the text under "4.9.3.3 Wildlife Resources Management Actions" has been revised as follows:

~~Seasonal restrictions on~~ Implementation of adaptive management measures for rocks and islands with important ~~sensitive~~ populations of seabirds, marine mammals, and/or intertidal species would apply to ~~would restrict activities on~~ lands within BLM's jurisdiction only, and would not conflict with any existing land use or management plans. As discussed in Chapter 2, "Alternatives," the agencies that manage adjacent areas would be consulted and coordinated with concerning designation and enforcement of all wildlife resources management actions.

~~Seasonal restrictions would be established under all action alternatives.~~ Under all alternatives, an adaptive management approach would be applied, as described in Chapter 2. For the reasons stated above, no adverse effects related to wildlife resources management actions are anticipated for any of the alternatives.

On page 4.9-4, under "4.9.3.7 Actions with No Reasonably Foreseeable Effects on Land Use/ Lands and Realty," the second bulleted item has been revised as follows:

- Special ~~Designations;~~ Management,

Section 4.10 Noise

On page 4.10-2, the second and third paragraphs under "4.10.3.3 Wildlife Resources Management Actions" have been revised as follows:

Establishing ~~seasonal restrictions~~ adaptive management measures for known ~~sensitive~~ important populations of seabirds, marine mammals, and intertidal species ~~would~~ could result in beneficial effects by reducing ~~on~~ ambient noise levels in the CCNM. ~~During seasonal restrictions, all activities with the potential to disturb wildlife would be prohibited or discouraged—including activities that may be very loud, such as overflights by airplanes, motorboat traffic and fireworks. Aircraft overflights are significant among seabirds, particularly when nesting; consultation with the FAA will be an important component of wildlife management to ensure that regulations pertaining to overflights are adequately enforced.~~

~~Seasonal restrictions established under all action alternatives~~ Under all alternatives, adaptive management measures would be applied, as described in Chapter 2, that ~~would~~ could result in minor beneficial effects on noise levels within the CCNM. Invasive wildlife species control under Alternatives A and B may result in minor adverse effects on monument noise levels.

On page 4.10-2, the first sentence in the first paragraph under "4.10.3.4 Recreation Management Actions" has been revised as follows:

As part of recreation management actions, structures or other facilities may be built ~~near~~ on the CCNM or the mainland to support the CCNM's recreation programs.

On page 4.10-3, the first sentence in the first paragraph under "4.10.3.5 Education and Interpretation Management Actions" has been revised as follows:

As part of the education and interpretation management actions, structures ~~would~~ may be built on or near the CCNM to support the monument's operations and education and recreation programs.

On page 4.10-4, the first two sentences in the first paragraph under "4.10.3.6 Land Use Authorizations" have been revised as follows:

~~As part of land use authorizations, structures may be built in the CCNM—such as communications facilities and aids to navigation. Construction of these facilities could generate noise, as discussed under "Recreation Management Actions," and "Education and Interpretation Management Actions."~~ Land use authorizations include facility construction, emergency uses of the CCNM (including response to oil spills or hazardous materials releases), filming, special events, and construction and maintenance of aids-to-navigation and communications facilities. To ensure protection of CCNM resources during emergency uses, filming, and special events operations, permits from applicable agencies and compliance with NEPA will be required. These land use authorizations potentially could generate noise.

On page 4.10-5, under "4.10.3.7 Actions with No Reasonably Foreseeable Effects on Noise," the second bulleted item has been revised as follows:

- Special ~~Designations~~ Management;

Section 4.11 Paleontologic Resources

On page 4.11-2, Section 4.11.3.2, "Visual Resources Management Actions," has been revised as follows:

Under all action alternatives, BLM would manage the CCNM to VRM Class ~~II~~ I standards ~~until VRM classes are permanently established in the future~~. The Class ~~II~~ I designation may indirectly protect paleontologic resources of the CCNM by prohibiting activities that may significantly alter the visual quality of the rocks and islands. Prohibited activities are not specified but may potentially include any surface-disturbing activity or any activity that would erode soils or alter the existing views. However, the Class ~~II~~ I designation could allow some minor development to occur in the CCNM. Prior to approving any development, further analysis would be required that would evaluate the potential adverse and beneficial effects of the project-specific action. In the event of adverse effects, BMPs and other mitigations would be applied to offset these effects (See Chapter 2, "Alternatives"). It is possible that no mitigation would be available to offset these effects. Due to the restrictive standards of the VRM Class I designation, however, paleontologic resources are expected to experience minor beneficial effects overall.

~~Minor adverse effects potentially could result from development activities under the VRM Class II designation. Effects of future changes to the VRM class designation may be beneficial or adverse. If the VRM class changes to a class with more restrictions on the activities that may occur in the CCNM, the effects are likely to be beneficial. Adverse effects would likely occur if fewer activities were restricted. Prior to any development, the adverse and beneficial effects would be identified. Mitigation would be implemented when possible to minimize potential adverse effects.~~

Conclusions

Alternatives A–C: Minor ~~adverse~~ beneficial effects on paleontologic resources ~~in the near-term, and indeterminate effects in the long term,~~ from visual resources management actions.

On page 4.11-2, the second paragraph under "4.11.3.3 Geologic, Soil, and Paleontologic Resources Management Actions" has been revised as follows:

An adaptive approach to management would be applied to the CCNM, restrictions being implemented as a last resort. Restricting ~~on-island~~ on-monument activities on the CCNM to protect geologic, soils, and paleontologic resources would minimize potential for incidental erosion of soils and exposure of paleontologic resources.

On page 4.11-3, the first paragraph has been revised as follows:

Alternatives A and B potentially would result in beneficial effects on paleontologic resources through ~~restrictions on~~ adaptive management of recreational activities.

On page 4.11-3, text under "4.11.3.4 Cultural Resources Management Actions" has been revised as follows:

Restricting ~~on-island~~ on-monument recreational activities, preparing a CRMP, and nominating NRHP-eligible properties for listing would decrease human-induced erosion and potential exposure of buried fossils in areas managed for cultural resources. ~~Designating the entire CCNM as a Cultural Resources Management Zone~~ Management of the entire CCNM to protect cultural resources under Alternative B would result in major beneficial effects on paleontologic resources by enacting the most stringent use controls. Monitoring and surveillance of cultural resources will also ensure that recreation and management measures are enforced, thereby further reducing soil erosion effects.

Native American traditional activities practiced in the CCNM are not expected to cause degradation of the CCNM's paleontologic resources, and the activities would be performed only in approved locations through consultation with BLM.

Alternative A potentially would result in minor beneficial effects on paleontologic resources as a result of ~~on-island activity restrictions~~ management measures that reduce surface disturbance, designation of historic properties, and surveillance by law enforcement personnel. Alternative B would result in major beneficial effects by ~~designating the entire CCNM as a Cultural Resources Management Zone~~ managing the entire CCNM for cultural resources. Alternative C would not involve any management actions that would deviate from current management, and therefore would result in no effects, either adverse or beneficial, relative to baseline conditions.

On page 4.11-4, the first sentence in the first paragraph under "4.11.3.6 Wildlife Resources Management Actions" has been revised as follows:

Protection of ~~sensitive~~ important seabird, marine mammal, and/or intertidal species by a tiered adaptive management approach potentially would result in reduced human-induced erosion at managed sites ~~by restricting certain on-island activities and human access to the CCNM during breeding seasons.~~

On page 4.11-4, the first sentence in the third paragraph under "4.11.3.6 Wildlife Resources Management Actions" has been revised as follows:

Alternatives A and B would result in minor beneficial effects on paleontologic resources through ~~use and access restrictions~~ implementation of adaptive management measures.

On page 4.11-5, the first and fifth sentences in the first paragraph under "4.11.3.7 Recreation Management Actions" have been revised as follows:

Restricting certain ~~on-island~~ on-monument recreational activities, such as camping, off-highway vehicle use, launching for hang-gliders, and rock climbing, would result in beneficial effects on paleontologic resources.

Actively engaging in offering, sponsoring, and partnering to provide active recreation opportunities in ~~and around~~ the CCNM would be considered adverse as increased recreation activities could erode soil surfaces and potentially expose buried fossils.

On page 4.11-7, the first full paragraph has been revised as follows:

All action alternatives would allow research activities throughout the CCNM except where designated otherwise as a result of management actions identified for other resources or uses. Approved research activities under Alternatives A and C would increase the understanding of the CCNM's resources, and address problems or questions of importance to science or society that show promise of making an important contribution to such knowledge. Alternative B would ~~would~~ favor research efforts that protect the ecological integrity of the CCNM.

On page 4.11-7, the first paragraph under "4.11.3.11 Land Use Authorizations" has been revised as follows:

Land use authorizations include facility construction, emergency uses of the CCNM (including response to oil spills or hazardous materials releases), filming, special events, and construction and maintenance of aids-to-navigation and communications facilities. To ensure protection of CCNM resources during emergency uses, filming, and special events operations, permits from applicable agencies and compliance with NEPA will be required. ~~Land use authorizations, such as construction of aids to navigation and communications facilities,~~ These land use authorizations could lead to human-induced erosion and accelerated runoff or erosion associated with construction activities, resulting in a small potential for effects on paleontologic resources.

On page 4.11-8, under "4.11.3.12 Actions with No Reasonably Foreseeable Effects on Paleontologic Resources," the first bulleted item has been revised as follows:

- Special ~~Designations~~ Management, or

Section 4.12 Population and Housing

On page 4.12-2, the first sentence in the first paragraph under "4.12.2.3 Land Use Authorizations" has been revised as follows:

Authorizing the use of monument lands ~~for the construction of utility corridors~~ could indirectly induce population growth.

On page 4.12-2, under "4.12.2.4 Actions with No Reasonably Foreseeable Effects on Population and Housing," the second bulleted item has been revised as follows:

- Special ~~Designations~~ Management;

Section 4.13 Public Services

On page 4.13-2, the first paragraph under "4.13.2.2 Management Actions for Geologic, Soil, and Paleontologic Resources; Cultural Resources; Vegetation Resources; and Wildlife Resources" has been revised as follows:

~~Key management actions that may be taken~~ Adaptive management measures will be implemented to manage physical, cultural, vegetation, and wildlife resources under the RMP; ~~are on-island activity restrictions~~ restrictions would be applied as a last resort.~~surveillance of sensitive sites, and seasonal wildlife restrictions.~~ Restricting ~~on-island recreation to low-impact~~ activities ~~and closing areas of the monument to human access during nesting and pupping seasons~~ would result in an increased need for law enforcement. Patrols would be needed to prevent people from illicitly accessing the rocks and islands. Additional, regular surveillance of ~~sensitive~~ important cultural resource sites also would necessitate new patrols.

On page 4.13-2, the fifth and sixth paragraphs under "4.13.2.2 Management Actions for Geologic, Soil, and Paleontologic Resources; Cultural Resources; Vegetation Resources; and Wildlife Resources" have been revised as follows:

For both of these issues, the extent of changes that would result from access restrictions on the coast are difficult to predict, because there is little existing data on law enforcement and emergency services on the monument. It is anticipated that any changes would be minor. In addition, the tiered adaptive approach to management, discussed in Chapter 2, would balance conflicts between natural resources and human activities in the CCNM.

Alternatives A and B potentially would result in adverse effects on public services through ~~on-island recreation restrictions, surveillance of sensitive cultural resource sites, and seasonal wildlife restrictions~~ implementation of adaptive management measures because additional staffing **could be** needed for management enforcement . Alternative C would not involve any management actions that would deviate from current management, and would result in no effects related to public services, because additional law enforcement would not be needed.

On page 4.13-6, under "4.13.2.8 Actions with No Reasonably Foreseeable Effects on Public Services," the second bulleted item has been revised as follows:

- Special ~~Designations~~ Management, or

Section 4.14 Utilities and Service Systems

On page 4.14-3, under "4.14.2.5 Actions with No Reasonably Foreseeable Effects on Utilities and Service Systems," the second bulleted item has been revised as follows:

- Special ~~Designations~~ Management;

Section 4.15 Recreation

On page 4.15-2, Section 4.15.3.2, "Visual Resources Management Actions," has been revised as follows:

In general, management of the CCNM for VRM Class ~~II~~ I objectives would benefit recreation because some minor development—potentially including staging areas for recreational activities—on the CCNM would be allowed. Prior to approving any developments on the CCNM consistent with the VRM Class ~~II~~ I objective, further project-specific analysis would be required that would evaluate the potential adverse or beneficial effects of the proposed action. As described in Chapter 2, "Alternatives," BMPs and other measures would be applied to offset effects. It is possible that no mitigation would be available to fully offset these effects. However, due to the restrictive standards of the VRM Class I designation, beneficial effects on recreation from new facilities are anticipated to be minor.

~~Minor beneficial effects potentially could result from development activities under the VRM Class II designation. Effects of future changes to the VRM class designation may be beneficial or adverse. If the VRM class changes to a class with fewer restrictions on the recreational infrastructure that may be constructed on the CCNM, the effects are likely to be beneficial. Adverse effects are likely occur if more restrictions are enacted.~~

Conclusions

Alternatives A–C: Minor beneficial effects on recreation~~ in the near term, and indeterminate effects in the long term,~~ from visual resources management actions.

On page 4.15-2, under "4.15.3.3 Management Actions for Geologic, Soil, and Paleontologic Resources and Vegetation Resources," the first and second paragraphs have been revised as follows:

A tiered adaptive management approach will balance protection of CCNM resources and human use activities, including recreation. As discussed in Chapter 2, access restrictions would be implemented as a last resort. Restricting ~~on-island~~ on-monument activities on the CCNM to protect geologic resources and/or vegetation resources would adversely affect recreation along the coast where such restrictions affect areas used for recreation. In particular, closures to all surface-disturbing activities would eliminate most forms of ~~on-island~~ on-monument recreation.

Alternative A would result in only minor adverse effects on recreation ~~from~~ if ~~on-island~~ on-monument activity restrictions were implemented as a management measure, because restrictions would apply to only portions of the monument, and alternative locations for recreation activities are anticipated. Alternative B would result in the most direct adverse effect, as it would eliminate all surface-disturbing activities, which would affect most forms of ~~on-island~~ on-monument recreation and would not provide alternate locations for displaced recreationists. This is considered a major adverse effect, for which mitigation would not be available. Alternative C would result in no effects related to recreation as people would continue to have the same level of access to the CCNM as currently exists.

On page 4.15-3, the second and third sentences in the third paragraph under "4.15.3.4 Cultural Resources Management Actions" have been revised as follows:

Alternative B would manage the entire monument to protect cultural resources~~by designating the entire CCNM as a Cultural Resources Management Zone~~. ~~Although this designation would not categorically exclude all recreation, it is anticipated that certain additional forms of recreation would not be allowed.~~

On page 4.15-4, the second and third paragraphs under "4.15.3.5 Wildlife Resources Management Actions" have been revised as follows:

Recreation activities that occur near the monument would not be ~~restricted by seasonal restrictions~~ managed by BLM, and so would not be affected. Under Alternatives A and B, ~~use restrictions would be designated~~ adaptive management would be implemented on ~~around~~ rocks and islands with known ~~sensitive~~ important populations of seabirds, marine mammals, and intertidal species where known human use conflicts exist. ~~Activities prohibited during seasonal restrictions include any activities with potential to disturb wildlife, their nests, or their pups.~~ These restrictions could result in adverse effects on many forms of recreation on the CCNM; however, alternate recreation locations are anticipated to be available such that any adverse effects are considered minor. Under ~~Alternative C,~~ all alternatives, ~~seasonal~~ restrictions would be implemented only where known conflicts exist and ~~also~~ would result in only minor adverse impacts because those recreationists could be directed to other monument locations.

On page 4.15-8, under "4.15.3.10 Actions with No Reasonably Foreseeable Effects on Recreation," the first bulleted item has been revised as follows:

- Special ~~Designations~~ Management,

Section 4.17 Socioeconomics

On page 4.17-1, the first paragraph under "4.17.2.2 Cadastral Support Management Actions" has been revised as follows:

Determining the current land ownership status of all rocks and islands, and developing maps of the monument could beneficially affect local economies, insofar as contracts would be let, and these contracts could be secured by the businesses and residents in the surrounding communities—thus increasing revenues and income. However, the economic benefit to local economies is expected to be small.

On page 4.17-2, text under "4.17.2.3 Management Actions for Geologic, Soil, and Paleontologic Resources; Cultural Resources; Vegetation Resources; and Wildlife Resources" has been revised as follows:

Management of CCNM resources would be directed by a tiered adaptive management approach, as discussed in Chapter 2. Key management actions that may be taken to manage physical, cultural, vegetation, and wildlife resources under the RMP ~~are~~ include ~~on-island~~ on-monument activity restrictions as a last resort ~~and seasonal wildlife restrictions~~. Restricting access to rocks and islands would deter visitation to the coast, and this decrease in visitation could potentially adversely affect adjacent communities' economic conditions, particularly through decreases in sales and transient occupancy revenues. However, because accessing the monument is only one of many attractions to most areas along the coast, and because there are relatively few communities adjacent to monument lands that would be affected by ~~on-island~~ on-monument access restrictions and/or seasonal wildlife restrictions, this effect would not require mitigation.

Alternatives A and B ~~would~~ could involve ~~on-island~~ on-monument activity restrictions~~, surveillance of sensitive cultural resource sites, and seasonal wildlife restrictions~~ as part of the adaptive management approach of CCNM resources. Alternative B also would involve bans on surface-disturbing activities and ~~designation of the entire CCNM as a Cultural Resources Management Zone~~ protection of all cultural resources within the CCNM. These management actions are considered to result in minor adverse effects on socioeconomics. Alternative C would not implement management actions that would restrict visitation, and so would have no effect.

On page 4.17-5, under "4.17.2.8 Actions with No Reasonably Foreseeable Effects on Socioeconomics," the second bulleted item has been revised as follows:

- Special ~~Designations~~ Management, or

Section 4.18 Traffic and Transportation

On page 4.18-4, under "4.18.3.5 Actions with No Reasonably Foreseeable Effects on Traffic and Transportation," the second bulleted item has been revised as follows:

- Special ~~Designations~~ Management;

Section 4.19 Visual Resources

On page 4.19-1, the fifth and sixth sentences in the second paragraph under "4.19.1 Methodology" have been revised as follows:

As discussed in Chapter 2, "Alternatives," the CCNM would be managed to VRM Class I ~~II~~ standards, whose objective is to ~~retain~~ preserve the existing character of the landscape. Contrasts ~~are visible but~~ must not attract attention and must minimally affect the immediate coastal viewshed.

On page 4.19-3, the first and second paragraphs under "4.19.3.2 Visual Resources Management Actions" have been revised as follows:

Managing the CCNM to VRM Class ~~II~~ I standards would allow for low levels of visual disturbance to the landscape. In VRM Class ~~II~~ I, management activities ~~may be seen but should~~ must not attract the attention of the casual observer. Visible changes to the existing view could occur, but changes must not attract attention and must minimally affect the immediate coastal viewshed. Any changes should repeat and not contrast against the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape.

The VRM Class ~~II~~ I classification could potentially allow minor habitat loss and disturbance related to building and maintenance of structures in the CCNM. As most rocks and islands in the monument are not suitable for the building of structures, however, this classification would not likely affect visual resources in the monument. Because the objective of VRM Class ~~II~~ I is to ~~retain~~ preserve the existing character of the landscape, this designation would result in preservation of the monument's scenic qualities.

On page 4.19-7, the first sentence in the first paragraph under "4.19.3.7 Land Use Authorizations" has been revised as follows:

All land use authorizations would be required to adhere to VRM Class ~~II~~ I standards.

On page 4.19-7, under "4.19.3.8 Actions with No Reasonably Foreseeable Effects on Visual Resources," the first bulleted item has been revised as follows:

- Special ~~Designations~~ Management;

Section 4.20 Water Resources

On page 4.20-2, Section 4.20.3.2, "Visual Resources Management Actions," has been revised as follows:

In general, management of the CCNM for VRM Class ~~II~~ I objectives would benefit water quality and water resources due to the preservation element in this class. However, VRM Class ~~II~~ I could allow some minor development on the CCNM that may result in erosion or other construction and operational water quality effects. Prior to approving any developments on the CCNM consistent with the VRM Class ~~II~~ I objective, further analysis would be required that would evaluate the potential adverse or beneficial effects of the project-specific action. In the event of adverse effects, BMPs and other mitigation measures would be applied to offset these effects. However, due to the restrictive standards of the VRM Class I objective, minor beneficial effects on water resources are anticipated.

~~Minor adverse effects potentially could result from development activities under the VRM Class II designation. Future designation of VRM Classes could result in positive or negative effects, depending on the classification. Designation of VRM Class I and Class II would generally be beneficial due to the restriction on development and related water quality effects. Designation of portions of the monument in VRM Classes III or IV would have greater potential for an adverse effect due to the allowance of additional activities that could affect water quality.~~

Conclusions

Alternatives A–C: Minor ~~adverse~~ beneficial effects on water resources ~~in the near term, and indeterminate effects in the long term,~~ from visual resources management actions.

On page 4.20-3, under "4.20.3.4 Cultural Resources Management Actions," the last sentence in the first paragraph has been revised as follows:

~~Designation of the entire CCNM as a Cultural Resource Management Zone~~ Management of the CCNM to protect all cultural resources would further contribute major beneficial effects to water resources by enacting more stringent use controls.

On page 4.20-3, under "4.20.3.4 Cultural Resources Management Actions," the last sentence in the last paragraph has been revised as follows:

Alternative B would result in major beneficial effects by ~~designating the entire CCNM as a Cultural Resources Management Zone~~ protecting all cultural resources within the CCNM.

On page 4.20-5, under "4.20.3.7 Recreation Management Actions," the first paragraph has been revised as follows:

~~The proposed recreation alternatives involve two basic categories of activities: activities on the CCNM and in surrounding waters, and activities adjacent to the CCNM on the mainland.~~ Recreation activities on ~~and surrounding~~ the CCNM can contribute to water quality degradation through releases of fuels, oils, and other contaminants from boats and the mechanisms previously identified associated with human use of the monument, which include increased erosion and sedimentation as a result of foot traffic and other surface-disturbing activities, deposition of trash, and human and animal waste.

On page 4.20.8, under "4.20.3.12 Actions with No Reasonably Foreseeable Effects on Water Resources," the first bulleted item has been revised as follows:

- Special ~~Designations~~ Management, or

Section 4.21 Wilderness and Other Special ~~Designations~~ Management

The section title and headers have been revised as shown above. All references to "special designations in this section have been changed to "special management."

On page 4.21-1, Section 4.21.2 has been revised as follows:

4.21.2 Effects on Wilderness Characteristics and Other Special ~~Designations~~ Management

Under the No Action Alternative, the existing ACEC and Ecological Preserve designations would remain in place. No areas would be ~~designated~~ identified as having wilderness characteristics. This alternative would not include any land acquisitions, nor would it change any uses presently allowed on any part of the monument. As noted in the Presidential Proclamation, the lands of the monument would not be sold, leased, or used for mineral extraction. There would be no conflict with or changes made to existing designations. There would be no effects on special ~~designations~~ management from the No Action Alternative.

Conclusion

No Action Alternative: No effects on wilderness ~~and~~ or other special ~~designations~~ management from no action.

On page 4.21-1, Section 4.21.2.2 has been revised as follows:

4.21.2.2 Special ~~Designations~~ Management

Under all action alternatives, the RMP would recognize that the rocks, islands, exposed reefs, and pinnacles of the CCNM have specific wilderness characteristics; and these characteristics would continue to be protected. In addition, the existing ACEC would be maintained, and its name would be changed from the California Islands Wildlife Sanctuary ACEC to the California Coastal ACEC. Maintenance of current special designations would not preclude the future designation of portions of the monument for other special uses, and no impact would result from recognition of wilderness characteristics. There would be no effects.

Appendices

Appendix C

Appendix C in the Draft RMP/Draft EIS, "Ocean and Coastal Managed Areas," is not reprinted in this document. Revisions to the EIS are identified below.

Page C-6 under "State Parks," following row 12 (Julia Pfeiffer Burns State Park), add the following row:

Limekiln State Park (Ocean or Coastal Holding), San Luis Obispo (County), DPR (Supervising Agency)

Page C-9 under the heading "State-Managed Holdings" and before the heading "Government Units," add a new sub-heading "Unclassified State Lands" and add the following row:

Estero Bay Park Property (Ocean or Coastal Holding), San Luis Obispo (County), DPR (Supervising Agency)

Appendix E

Appendix E in the Draft RMP/Draft EIS, "Description of Individual ~~Management~~ Sub-Units of the CCNM," is not reprinted in this document. Revisions to Table E-1 in the EIS are identified below.

Page E-5, Sub-Unit 32, La Jolla/Point Loma, under the column heading "Features," has been revised as follows:

Some small exposed rocks at La Jolla Cove off Ellen Scripps City Park~~,~~ and at Children's Pool (including harbor seal haul-out area); Bird Rock~~,~~ and exposed reef at False Point; "Southern Rock" at Sunset Cliffs City Park; Point Loma, including Navy facilities and NPS Cabrillo National Monument and USCG light station at end of point

Page E-5, Sub-Unit 36, Farallon Islands, under the column heading "Location," has been revised as follows:

Southeast Far~~r~~allon, Middle Farallon, and North Farallon Islands

Page E-5, Sub-Unit 36, Farallon Islands, under the column heading "Features," has been revised as follows:

All within Far~~r~~allon ~~Islands~~ NWR managed by ~~US~~FWS

Appendix K

Appendix K in the Draft RMP/Draft EIS, "Partial List of BLM Coastal Holdings and California Coastal Parks and Beaches," is not reprinted in this document. Revisions to Table K-1 in the EIS are identified below.

Page K-10, under the heading "California Department of Parks and Recreation Units," add a new row after the entry for Morro Strand State Beach, with the following information:

Limekiln State Park (Park or Beach), San Luis Obispo (County), Locations of offshore rocks and islands need to be assessed. (Information)

Page K-11, after the entry for San Clemente State Beach under the heading "California Department of Parks and Recreation Units," add a new heading and a new row with the following information:

Unclassified State Lands

Estero Bay Park property (Park or Beach); San Luis Obispo (County); A few scattered rocks, exposed reefs and sea stacks. (Information)

Chapter 5 Consultation and Coordination

Since the beginning of the planning process for the CCNM, BLM has made substantial efforts to involve the public and agencies in its information-gathering and decision-making process. This outreach has helped to inform the planning process and ensure that alternative management approaches, and their anticipated outcomes, are understood. Public and agency involvement has included a series of public scoping meetings, public meetings on the Draft RMP/Draft EIS, consultation with numerous agencies and Native American tribes, and regular meetings of an interdisciplinary team made up of agency experts.

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  5.1.1 Notice of Intent 5-1
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Chapter 5

Consultation and Coordination

5.1 Public Scoping Process

5.1.1 Notice of Intent

A Notice of Intent (NOI) to prepare an RMP for the CCNM was published in the *Federal Register* on April 24, 2002. (The full text of the NOI appears in the Scoping Report.) A notice announcing the time and location of the eight initial public scoping meetings was mailed in early August 2002 to more than 450 individuals, organizations, and government agencies. In addition, news releases announcing the times and locations of the meetings were sent to approximately 500 media outlets for the 15 California coastal counties. The public scoping period lasted from April 24, 2002, through October 25, 2002.

5.1.2 Public Scoping Meetings

Public scoping meetings were held in Bodega Bay, Elk, Trinidad, San Diego, Laguna Beach, Santa Barbara, Monterey, and San Francisco, California. Each meeting had a local host. The local hosts were local organizations that served as the BLM's local contact, providing or helping BLM find a meeting facility and assisting with publicizing the meeting. In most cases, the local host also sent a representative to open the meeting; welcome BLM and the various attendees; and introduce Rick Hanks, the CCNM Manager. Mr. Hanks facilitated and gave a presentation on the CCNM at each of the eight meetings.

The roster of local hosts demonstrates the variety of potential partners for the CCNM. The hosts included business associations, research facilities, an environmental organization, and a maritime museum. The date, time, location, and local host for each of the eight meetings are listed in Table 5-1.

At each of the public scoping meetings, CCNM Manager Rick Hanks gave a short presentation about the BLM and the National Landscape Conservation System, the CCNM, and the planning process for developing the RMP. The attendees were informed that the primary purpose of the initial public scoping meetings was to begin to identify the issues and concerns that the RMP should be addressing. The attendees were asked to identify any additional individuals, organizations, or entities that BLM should contact regarding data, issues, or concerns relevant to CCNM management, as well as any information sources that might be useful in preparation of the RMP.

Table 5-1. Date, Time, Location, and Local Host for Each Public Scoping Meeting

Date	Time	Location	Local Host
August 20, 2002 (Tuesday)	7–9 p.m.	Bodega Bay	Bodega Marine Laboratory, University of California, Davis
August 21, 2002 (Wednesday)	7–9 p.m.	Elk	Elk Business Association
August 22, 2002 (Thursday)	7–9 p.m.	Trinidad	Trinidad Chamber of Commerce
August 27, 2002 (Tuesday)	7–9 p.m.	San Diego	Scripps Institution of Oceanography, University of California, San Diego
August 28, 2002 (Wednesday)	7–9 p.m.	Laguna Beach	Surfrider Foundation, Laguna Beach Chapter
August 30, 2002 (Friday)	7–9 p.m.	Santa Barbara	Santa Barbara Maritime Museum
September 4, 2002 (Wednesday)	1–3 p.m.	Monterey	Monterey Bay National Marine Sanctuary
September 5, 2002 (Thursday)	7–9 p.m.	San Francisco	Golden Gate National Recreation Area, National Park Service

Following a brief question-and-answer period, the attendees were divided into two to four groups, depending on the total number of attendees present at each meeting. Each group was assigned a facilitator and a recorder. Rick Hanks and Mike Rushton, Senior Vice President of Jones & Stokes (the environmental consulting firm contracted to work with BLM on development of the RMP), served as facilitators for all eight meetings. When additional facilitators were needed, BLM field managers or Jones & Stokes resource specialists filled that role. BLM and Jones & Stokes employees served as recorders. Each group met for at least 30 minutes, and every attendee was encouraged to provide input. Each individual comment was recorded on a flip chart. When the individual group information sessions were completed, the flip charts were brought to the front of the room and each group's comments were summarized for all the attendees to hear. Any additional comments or concerns were heard and recorded at that time.

Attendees were given the opportunity to submit a CCNM comment card that could be left with the staff at the meeting or mailed to the CCNM office by October 25, 2002, the closing date for the CCNM scoping period. A list of attendees and staff present at each public scoping meeting and a brief summary of public comments and concerns from each meeting are provided in the Scoping Report. (The comments and information recorded on each flip chart from the eight scoping meetings also are provided in the Scoping Report.)

5.1.3 Independent Scoping Meetings

In addition to the formal public scoping meetings, several independent meetings were held with interested parties to identify issues of importance. A list of attendees and staff present at each independent scoping meeting and a brief summary of comments and concerns from each meeting are provided in the Scoping Report. The date, time, location, and participating agency at each of the meetings are listed in Table 5-2.

Table 5-2. Date, Time, Location, and Participating Agency for Each Independent Scoping Meeting

Date	Time	Location	Participating Agency
August 29, 2002 (Thursday)	10:00–11:30 a.m.	Camarillo	U.S. Department of the Interior's Minerals Management Service, Pacific Regional Office
August 29, 2002 (Thursday)	2:00–3:30 p.m.	Ventura	Channel Islands National Park and the National Park Service
September 5, 2002 (Thursday)	3:00–4:00 p.m.	San Francisco	California Marine Protected Areas Working Group and the California Ocean Management Program
September 6, 2002 (Friday)	1:00–3:30 p.m.	San Francisco	California Coastal Commission

5.1.4 Letters of Comment

During the public scoping period, BLM received 25 letters providing input for the RMP and NEPA processes. The individuals, groups, and agencies that sent comment letters, as well as subjects addressed in the letters, are summarized in the Scoping Report.

5.2 Cooperation and Consultation with Agencies

5.2.1 Agencies Contacted

A total of 48 agencies and tribes were contacted to determine their interest in being a cooperating agency for the CCNM RMP and NEPA processes: six federal agencies, five California state agencies, 15 California coastal counties, and 22 federally recognized tribes. The invited agencies and tribes are listed below, with the date of correspondence and basis for invitation. Copies of the correspondence requesting cooperating agency status are included in the Scoping Report.

Federal Agencies

1. **Monterey Bay National Marine Sanctuary (MBNMS)**, National Sanctuary Program, National Ocean Service, National Oceanic and Atmospheric Administration (NOAA), U.S. Department of Commerce (William Douros, Superintendent), 10/07/02. Basis: MBNMS is a collaborative partner with CCNM; the sanctuary extends along 20 percent of the California coast with jurisdiction below the mean high tide line.

2. **U.S. Minerals Management Service (MMS)**, Pacific Outer Continental Shelf Region, U.S. Department of the Interior (DOI) (Lisle Reed, Regional Director), 10/18/02. Basis:

MMS has management responsibility for lands below the CCNM jurisdiction from 3 to 12 nautical miles off the California coastline.

3. **U.S. Fish and Wildlife Service (FWS)**, California/Nevada Operations, Pacific Region, DOI (Steve Thompson, CA/NV Ops Manager), 10/18/02. Basis: FWS has jurisdiction over bird and plant species listed as threatened or endangered under the federal ESA, as well as migratory bird oversight and enforcement responsibilities. In addition, FWS conducts ongoing monitoring and research activities within the CCNM area related to seabird colonies and oil spill restoration.

4. **National Marine Fisheries Service (NMFS)**, Southwest Regional Office, NOAA, U.S. Department of Commerce (Rodney McGinnis, Acting Regional Administrator), 10/18/02. Basis: NMFS is responsible for both marine fisheries and sea mammal protection and enforcement.

5. **National Park Service (NPS),** Pacific West Region, DOI (Jonathan Jarvis, Regional Director), 3/30/03. Basis: NPS manages six National Park units (Redwoods National Park, Point Reyes National Seashore, Golden Gate National Recreation Area, Santa Monica Mountains National Recreation Area, Channel Islands National Park, and Cabrillo National Monument) near or adjacent to the CCNM.

6. **U.S. Air Force (USAF),** Department of the Air Force (Maureen Koetz, Deputy Assistant Secretary, Environment, Safety and Occupational Health), 5/5/03. Basis: The USAF is responsible for the management of Vandenberg AFB, consisting of over 100,000 acres of federal land on the California coast from Point Conception to south of Point Sal—including 35 miles of coastline. The USAF has developed an Integrated Natural Resources Management Plan (INRMP) for Vandenberg AFB and maintains an environmental staff to oversee the implementation and management of the INRMP. The USAF is interested in functioning as a "steward" in the management of the portion of the CCNM adjacent to Vandenberg AFB.

Federally Recognized Tribes

The following federally recognized tribes along the California coast or with a California coastal interest that were contacted are listed below:

1. **Big Lagoon Ranchería**, Trinidad, CA (Virgil Moorehead, Chair), 11/22/02.

2. **Coyote Valley Reservation**, Redwood Valley, CA (Pricilla Hunter, Chair), 11/22/02.

3. **Dry Creek Ranchería**, Healdsburg, CA (Elizabeth Elgin DeRouen, Chair), 11/22/02.

4. **Elk Valley Ranchería**, Crescent City, CA (Dale Miller, Chair), 11/22/02.

5. **Graton Ranchería**, Novato, CA (Greg Sarris, Chair), 11/22/02.

6. **Hoopa Valley Indian Reservation**, Hoopa, CA (Clifford Lyle Marshall, Chair), 11/22/02.
7. **Hopland Reservation**, Hopland, CA (Sandra Sigala, Chair), 11/22/02.
8. **Karuk Tribe of California**, Happy Camp, CA (Alvus Johnson, Chair), 11/22/02.
9. **Laytonville Ranchería**, Laytonville, CA (Vernon Wilson, Chair), 11/22/02.
10. **Lytton Ranchería**, Santa Rosa, CA (Margie Mejia, Chair), 11/22/02.
11. **Manchester Point Arena Ranchería**, Point Arena, CA (Jose Oropeza, Chair), 11/22/02.
12. **Pinoleville Reservation**, Ukiah, CA (Leona Williams, Chair), 11/22/02.
13. **Redwood Valley Reservation**, Redwood Valley, CA (Elizabeth Hansen, Chair), 11/22/02.
14. **Resighini Ranchería**, Klamath, CA (William Scott, Chair), 11/22/02.
15. **Rohnerville Ranchería**, Loleta, CA (James Moon, Jr., Chair), 11/22/02.
16. **Round Valley Reservation**, Covelo, CA (John Azbill, President), 11/22/02.
17. **Sherwood Valley Reservation**, Willits, CA (Allen Wright, Chair), 11/22/02.
18. **Smith River Ranchería**, Smith River, CA (Kara Miller, Chair), 11/22/02.
19. **Stewarts Point Ranchería**, Santa Rosa, CA (Lester Pinola, Chair), 11/22/02.
20. **Table Bluff Reservation**, Loleta, CA (Cheryl Seidner, Chair), 11/22/02.
21. **Trinidad Ranchería**, Trinidad, CA (Carol Ervin, Chair), 11/22/02.
22. **Yurok Indian Reservation**, Klamath, CA (Sue Masten, Chair), 11/22/02.

State Agencies

1. **California Department of Fish and Game (DFG)**, State of California Resources Agency (Robert Hight, Director), 10/01/02. Basis: DFG is one of the two California state agencies that serve as “core managing partners” with BLM in managing the CCNM. DFG is responsible for enforcing state fish and game laws; managing California’s diverse fish, wildlife, and plant resources and the habitats upon which they depend—for their ecological values and for their use and enjoyment by the public, including California’s marine ecosystem; and managing California’s oil spill prevention and response program.
2. **California Department of Parks and Recreation (DPR)**, State of California Resources Agency (Ruth Coleman, Acting Director), 10/01/02. Basis: DPR is one of the two

California state agencies that serve as core-managing partners with BLM in managing the CCNM. DPR administers 25 percent of the California coast; a large portion of the CCNM is directly associated with California State Park System units. DPR's mission is to provide for the health, inspiration, and education of the people of California by helping to preserve the state's extraordinary biological diversity, protecting its most valued natural and cultural resources, and creating opportunities for high-quality outdoor recreation.

3. **California State Lands Commission (SLC)**, State of California Resources Agency (Paul Thayer, Executive Officer), 10/18/02. Basis: SLC has management responsibility for lands below the CCNM jurisdiction from below mean high tide line to 3 nautical miles off the California coastline.

4. **California Coastal Commission**, State of California Resources Agency (Peter Douglas, Executive Director), 10/18/02. Basis: The primary mission of the California Coastal Commission is to plan for and regulate land and water uses in the coastal zone consistent with the policies of the Coastal Zone Management Act. This mission includes handling the federal Consistency Program that assures that federal activities, permits, and funding approvals are conducted in a manner consistent with the state's coastal program.

5. **California State Coastal Conservancy**, State of California Resources Agency (Sam Schuchat, Executive Officer), 10/18/02. Basis: The California State Coastal Conservancy is a state agency that uses entrepreneurial techniques to work in partnership with others to preserve, improve, and restore public access and natural resources along the California coast. The California Legislature created the Conservancy as a unique entity with flexible powers to serve as an intermediary among government, citizens, and the private sector in recognition that creative approaches would be needed to preserve California's coast for future generations. The California State Coastal Conservancy's non-regulatory, problem-solving approach complements their work.

California Coastal Counties

The 15 California coastal counties that were contacted are listed below:

1. **Del Norte**, Crescent City, CA (Charles Blackburn, Board of Supervisors Chair), 09/25/02.

2. **Humboldt**, Eureka, CA (Bonnie Neely, Board of Supervisors Chair), 09/25/02.

3. **Mendocino**, Ukiah, CA (J. David Colfax, Board of Supervisors Chairman), 09/25/02.

4. **Sonoma**, Santa Rosa, CA (Mike Kerns, Board of Supervisors Chairman), 09/25/02.

5. **Marin**, San Rafael, CA (Cynthia Murrar, Board of Supervisors President), 09/25/02.

6. **San Francisco** (City and County), San Francisco, CA (Tom Ammiano, Board of Supervisors President), 09/25/02.

7. **San Mateo**, Redwood City, CA (Jerry Hill, Board of Supervisors President), 09/25/02.

8. **Santa Cruz**, Santa Cruz, CA (Jan Brautz, Board of Supervisors Chairperson), 09/25/02. Basis: one of the 15 California coastal counties.

9. **Monterey**, Salinas, CA (Dave Potter, Board of Supervisors Chair), 09/25/02. Basis: one of the 15 California coastal counties.

10. **San Luis Obispo**, San Luis Obispo, CA (Shirley Bianchi, Board of Supervisors Chairperson), 09/25/02. Basis: one of the 15 California coastal counties.

11. **Santa Barbara**, Santa Barbara, CA (Gail Marshall, Board of Supervisors Chair), 09/25/02. Basis: one of the 15 California coastal counties.

12. **Ventura**, Ventura, CA (John Flynn, Board of Supervisors Chair), 09/25/02. Basis: one of the 15 California coastal counties.

13. **Los Angeles**, Los Angeles, CA (Zev Yaroslavsky, Board of Supervisors Chairman), 09/25/02. Basis: one of the 15 California coastal counties.

14. **Orange**, Santa Ana, CA (Cynthia Coad, Board of Supervisors Chair), 09/25/02. Basis: one of the 15 California coastal counties.

15. **San Diego**, San Diego, CA (Ron Roberts, Board of Supervisors Chairman), 09/25/02. Basis: one of the 15 California coastal counties.

5.2.2 Agencies Requesting Cooperating Agency Status

Of the 48 agencies, counties, and tribes invited to request cooperating agency status, BLM received responses from two federal agencies, three California state agencies, six California coastal counties, and one federally recognized tribe by the close of the scoping period. Of these 12 responses, 10 requested or stated that they were interested in cooperating agency status. The 10 entities requesting cooperating agency status are listed below:

1. DPR,
2. DFG,
3. SLC (requested "limited" status),
4. San Luis Obispo County,
5. Humboldt County,
6. Del Norte County,
7. Santa Cruz County,
8. Trinidad Ranchería,
9. USAF, and
10. NPS.

An individual Draft MOU was sent to each of the 10 entities requesting cooperating agency status. Cooperating Agency MOUs were completed and signed with DPR, DFG, and Trinidad Ranchería. A

Cooperating Agency MOU is still in the process of being completed with the USAF. All four of the counties that were sent proposed MOUs later declined the offer to serve as a cooperating agency.

5.3 Collaboration with Tribes

BLM contact with federally recognized tribes is discussed above. In addition to contacting these federally recognized groups, BLM forwarded letters to a broader range of Native American groups to solicit information on traditional cultural properties along the coast. The list of groups contacted and the letter requesting information are included in the Scoping Report.

5.4 Interdisciplinary Team Process

To assist with development of the CCNM RMP, an Interdisciplinary (ID) Team was formed, consisting of disciplinary specialists from BLM and BLM's consultants; representatives from DPR, DFG, and Trinidad Ranchería (each signed a Cooperating Agency MOU); and representatives from the USAF (a Cooperating Agency MOU is pending with BLM). The ID Team met numerous times throughout the planning process to develop issue area content for the RMP, to discuss public scoping issues that were brought forward through the planning process, and to review and provide feedback on draft and final project deliverables. The ID Team meetings were used as a forum to solicit input and gather data from BLM Field and State Office personnel, as well as from partnering agencies. A list of the ID Team is provided in Chapter 6.

In addition to the ID Team, BLM managers and specialists, as well representatives from various agencies and organizations, were invited to participate in the ID Team meetings and to review various documents leading to the development of the Draft RMP/Draft EIS. Table 5-3 lists those agency and organization contacts.

Table 5-3. Participants in Development of the Draft RMP/Draft EIS in Addition to the ID Team

Agency/Organization and Contact	Position	Office and Location
Bureau of Land Management, USDI		
Dan Averill	Assistant Field Manager	Arcata Field Office, Arcata, CA
Bob Beehler	Field Manager	Hollister Field Office, Hollister, CA
John Bogacki	Park Manager	Piedras Blancas Light Station, San Simeon, CA
Rich Burns	Field Manager	Ukiah Field Office, Ukiah, CA
Ron Fellows	Field Manager	Bakersfield Field Office, Bakersfield, CA
Jonna Hildenbrand	Outdoor Recreation Planner	Ukiah Field Office, Ukiah, CA
George Hill	Assistant Field Manager	Hollister Field Office, Hollister, CA
Ron Huntsinger	Field Manager	Bakersfield Field Office, Bakersfield, CA
John Kalish	Lands, Minerals and Recreation Supervisor	Palm Springs/South Coast Field Office, Palm Springs, CA
Diane Knox	Stornetta Project Coordinator	Ukiah Field Office, Ukiah, CA
Steve Razo	Deputy District Manager, Outreach	California Desert District, Moreno Valley, CA
Lynda Roush	Field Manager	Arcata Field Office, Arcata, CA
Gary Sharpe	Assistant Field Manager	Ukiah Field Office, Ukiah, CA
John Skibinski	Assistant Field Manager	Bakersfield Field Office, Bakersfield, CA
Bob Wicks	Planning and Environmental Coordinator	Arcata Field Office, Arcata, CA
Minerals Management Service, USDI		
Maurice Hill	Environmental Coordinator	Pacific OCS Region, Office of Environmental Evaluation, Camarillo, CA
Fish and Wildlife Service, USDI		
Joella Buffa	Farallon Islands National Wildlife Refuge Manager	San Francisco Bay National Wildlife Refuge Complex, Newark, CA
Roy Lowe	Project Leader	Oregon Coast National Wildlife Refuge Complex, Newport, OR
Gerry McChesney	Common Murre Restoration Project Leader	San Francisco Bay National Wildlife Refuge Complex, Newark, CA
Maura Naughton	Regional Seabird Biologist	Pacific Region, Migratory Birds and Habitat Programs, Portland, OR
National Park Service, USDI		
Ray Murray	Partnership and Planning Chief	Pacific West Region, Oakland, CA

Table 5-3. Participants in Development of the Draft RMP/Draft EIS in Addition to the ID Team (continued)

Agency/Organization and Contact	Position	Office and Location
National Oceanic and Atmospheric Administration (NOAA), U.S. Dept. of Commerce		
Aaron King	Program Manager/Marine Scientist	National Marine Protected Areas Center Science Institute, Monterey, CA
Sean Hastings	Resource Protection Coordinator	Channel Islands National Marine Sanctuary, Santa Barbara, CA
Sean Morton	Management Plan Coordinator	Monterey Bay National Marine Sanctuary, Monterey, CA
Rebecca Smyth	California Regional Coordinator	National Ocean Service, San Francisco, CA
Gerry Wheaton	West Coast Regional Manager	Office of Coast Survey, Seaside, CA
Air Force, U.S. Department of Defense		
Walter Schobel	Air Space and Offshore Management Chief	30th Space Wing, Vandenberg Air Force Base, CA
Navy, U.S. Department of Defense		
Alex Stone	Sea Range Environmental Coordinator	NAVAIR Resources Division, Point Mugu, CA
Coast Guard, U.S. Department of Homeland Security		
Stephanie Burkhart	Marine Protected Species Strategic Planner	Pacific Area Command, Alameda, CA
Coastal America		
Jim Colby	Deputy Director for Regional Programs	Coastal America, Washington, DC
Paul Michel	Southwest Regional Implementation Team Co-Chair	Water Management Division, US Environmental Protection Agency, San Francisco, CA
Steve Thompson	Southwest Regional Implementation Team Co-Chair	San Francisco Bay Project, NOAA, San Francisco, CA
Forest Service, U.S. Department of Agriculture		
Jeff Kwasney	Big Sur Ecosystem Manager	Los Padres National Forest, Big Sur, CA
California Department of Parks and Recreation		
Dave Schaub	Natural Heritage Section Manager (and CCNM Coordinator)	Natural Resources Division, Sacramento, CA
California Department of Fish and Game		
Paul Riley	Marine Fisheries Biologist	Marine Region, Monterey, CA
Marija Vojkovich	Assistant Manager/Offshore Ecosystem Coordinator (and CCNM Coordinator)	Marine Region, Santa Barbara, CA

Table 5-3. Participants in Development of the Draft RMP/Draft EIS in Addition to the ID Team (continued)

Agency/Organization and Contact	Position	Office and Location
California State Lands Commission		
Dwight Sanders	Division Chief	Division of Environmental Planning and Management, Sacramento, CA
California Coastal Commission		
Marina Cazorla	Environmental Specialist	Energy and Ocean Resources Unit, San Francisco, CA
Ellen Faurot-Daniels	Oil Spill Program Supervisor	Energy and Ocean Resources Unit, San Francisco, CA
Lee Otter	Chief Planner	Central Coast District, Santa Cruz, CA
Larry Simon	Coastal Program Analyst	Energy and Ocean Resources Unit, San Francisco, CA
California Coastal Conservancy		
Steve Horn	Deputy Executive Officer	California Coastal Conservancy, San Francisco, CA
San Luis Obispo County		
Ellen Carroll	Environmental Coordinator	Department of Planning and Building, San Luis Obispo, CA
San Mateo County		
Sam Herzberg	Senior Planner	Parks and Recreation Division, Redwood City, CA
City of Laguna Beach		
Mark Klosterman	Marine Safety Chief	City of Laguna Beach, CA
City of San Diego		
Robin Stribley	Natural Resource Manager	Parks and Recreation Department, San Diego, CA
PRBO Conservation Science		
Christine Abraham	Seabird Biologist	Marine Ecology Division, Stinson Beach, CA
Gregg Elliott	Policy Analyst	PRBO, Davis, CA
Kyra Mills	California Current Marine Bird Conservation Plan Project Coordinator	Marine Ecology Division, Stinson Beach, CA
The Nature Conservancy		
Mary Gleason	Senior Conservation Planner	Marine Division, San Francisco, CA

Table 5-3. Participants in Development of the Draft RMP/Draft EIS in Addition to the ID Team (continued)

Agency/Organization and Contact	Position	Office and Location
Partnership for Interdisciplinary Studies of Coastal Oceans (PISCO)		
Mark Carr	PISCO Principal Investigator	Long Marine Laboratory, UCSC, Santa Cruz, CA

Note: The contacts listed in this table are in addition to members of the Interdisciplinary (ID) Team. See Chapter 6 for a list of the ID Team.

5.5 Public Meetings on the Draft RMP/Draft EIS

Following release of the Draft RMP/Draft EIS, BLM conducted a series of public meetings along the coast to update the public on the CCNM planning process and to receive comments on the draft documents. The locations, dates, and local sponsors for these public meetings are listed in Table 5-4.

Table 5-4. Date, Time, Location, and Local Host for Public Meetings on the Draft RMP/Draft EIS

Date	Time	Location	Local Host
October 14, 2004 (Thursday)	7:00-9:00 p.m.	Moss Landing	Moss Landing Marine Laboratory
October 19, 2004 (Tuesday)	7:00-9:00 p.m.	Point Arena	Point Arena Lighthouse Keepers
October 20, 2004 (Wednesday)	7:00-9:00 p.m.	Elk	California Department of Parks and Recreation (DPR), Mendocino District
October 21, 2004 (Thursday)	7:00-9:00 p.m.	Trinidad	DPR, North Coast Redwoods District
October 27, 2004 (Wednesday)	7:00-9:00 p.m.	La Jolla	Scripps Institution of Oceanography
October 28, 2004 (Thursday)	7:00-9:00 p.m.	Long Beach	Aquarium of the Pacific
November 4, 2004 (Thursday)	7:00-9:00 p.m.	San Francisco	Golden Gate National Recreation Area

More than 200 people participated in the seven meetings. At most of the meetings, a representative for the local host opened the meeting. Rick Hanks, CCNM Manager, followed the opening comments and introductions with a brief explanation regarding the purpose of the meeting and then, using a PowerPoint presentation, discussed the comment period and the CCNM RMP schedule, explained what the CCNM is and what it is not, and summarized the alternatives in the Draft RMP/Draft EIS—with emphasis on the main points of the Preferred Alternative. The last half of each meeting was a question-and-answer session related to the draft plan. Staff from BLM, DFG, DPR, and BLM's consultant (Jones & Stokes) were present to answer questions and provide further detail to the public. The main questions and concerns expressed by the meeting attendees were recorded on flip charts so that individuals could ensure that their input was properly recorded. Following the meetings, summaries of each of the seven meetings were posted for review on the CCNM's web site. This input also was reviewed and organized into a number of common themes to be used in revising the Draft RMP/Draft EIS into this Proposed RMP/Final EIS. The major concerns expressed at the public hearings include:

- The jurisdiction of BLM relative to other management/regulatory agencies on and adjacent to the monument needs to be more clearly described.
- The criteria to be used to identify "sensitive" resources needs better definition and a chance for public participation.
- The CCNM RMP may substantially affect recreation access along the coast.

A wide range of additional issues and concerns was raised at these meetings; these are addressed in the Final EIS.

5.5.1 Additional Briefings

Since the public meetings were conducted, the CCNM manager attended briefings with a number of groups to describe the status of the RMP. The date, location, and agency attending each briefing are listed in Table 5-5.

Table 5-5. Additional Briefings Regarding the CCNM Draft RMP/Draft EIS

Date	Agency, Location
August 13, 2004	BLM Northwest California Resource Advisory Council, Arcata
September 17, 2004	Research Application Panel, Monterey Bay National Marine Sanctuary Advisory Council, Monterey
September 28, 2004	Golden Gate National Recreation Area, National Park Service (meeting with Superintendent), San Francisco
September 28, 2004	Southwest Regional Implementation Team, Coastal America, San Francisco
October 15, 2004	BLM Central California Resource Advisory Council, Fort Hunter Leggett
October 28, 2004	Pacific Region, National Marine Fisheries Service, NOAA, Long Beach
October 29, 2004	Pacific Outer Continental Shelf Region, Minerals Management Service, USDI, Camarillo
November 3, 2004	California Seabird Coordination Meeting, Point Reyes National Seashore
November 5, 2004	BLM California Northwest Resource Advisory Council, Ukiah

Chapter 6 List of Preparers

The Proposed RMP/Final EIS for the CCNM reflects the cooperative efforts of an Interdisciplinary Team, consisting of staff from BLM and other agencies and interest groups, and private consultants. This chapter identifies members of the Interdisciplinary Team and the key individuals who were responsible for preparing the plan and the EIS.

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Chapter 6
List of Preparers

Individual	Position	Role
INTERDISCIPLINARY TEAM		
Nancy Alex	BLM Land Law Examiner (CASO)	Lands and realty/land records
Larry Ames	BLM Park Ranger/Interpretive Specialist (UFO)	Visitor use and webmaster
Clemens Arrasmith	BLM GIS Cartographer (CASO)	GIS and mapping
Jim Berry	DPR Senior Ecologist	DPR representative/marine ecology
Paul Brink	BLM National Landscape Conservation System Program Lead and Wilderness Coordinator (CASO)	Wilderness management and special designations
Yolanda Chavez	BLM Tribal Relations Liaison (UFO)	Tribal relations
Emily Evans	BLM Park Ranger/Interpretive Specialist (AFO)	Interpretation and environmental education
Jeff Fontana	BLM Public Affairs Officer (Northern California)	Public affairs and outreach
Nancy Read Francine	USAF Flight Wildlife Biologist (Vandenberg Air Force Base)	USAF representative/coastal wildlife
Rick Hanks	BLM CCNM Manager (CASO)	Management direction and approach
Greg Hill	BLM Planning and environmental coordinator (PSSCFO)	Core team representative
Steve Horne	BLM Archaeologist (CASO)	Cultural resources
Eliseo Ilano	BLM Planning and Environmental Coordinator (CASO)	Planning lead

Individual	Position	Role
INTERDISCIPLINARY TEAM (continued)		
Paul Kelly	DFG/Office of Spill Prevention and Response Coastal and Marine Bird Biologist	DFG representative/seabirds and oil spills
John Key	BLM Environmental Protection Specialist (CDD)	Oil spill and hazardous materials response
Steve Larson	BLM Assistant Field Manager, Resources (BFO)	Natural resources
David Lawler	BLM Mining Engineer (CASO)	Paleontology
Ed Lorentzen	BLM Endangered Species Specialist (CASO)	Environmental Species Act compliance
Jack Mills	BLM Planning and Environmental Coordinator (CASO)	Planning and environmental processes
Tim Moore	BLM Physical Scientist/ Hazmat Specialist (HFO)	Hazardous materials
Sam Morrison	BLM Geologist (AFO)	Geology
Sky Murphy	BLM Planning and Environmental Coordinator (HFO)	Core team representative
Greg Nesty	Trinidad Ranchería Environmental Program Coordinator	Trinidad Ranchería representative
Paul Roush	BLM Regional Wildlife Biologist (Northern California)	Wildlife
David Schaub	DPR Natural Heritage Section Manager	Core team representative
Gary Sharpe	BLM Assistant Field Manager (UFO)	Core team representative
John Skibinski	BLM Assistant Field Manager (BFO)	Core team representative
Rich Smith	BLM State Staff Law Enforcement Ranger (CASO)	Law enforcement
Tim Smith	BLM Outdoor Recreation Planner (CASO)	Recreation
Robert Wick	BLM Planning and Environmental Coordinator (AFO)	Visual resources and core team representative
John Willoughby	BLM Botanist (CASO)	Vegetation
Marija Vojkovich	DFG Assistant Manager, Marine Region	Core team representative
Ken Wilson	BLM Archaeologist (CASO)	Cultural resources compliance

Individual	Position	Role
INTERDISCIPLINARY TEAM (continued)		
Alex Young	BLM Landscape Architect (CASO)	Facilities design and signage/ visual resources/landscape management
JONES & STOKES		
Project Management Team		
Mike Rushton	Principal	Project director and plan development
Michael Murrell Stevenson	Senior Ecologist and NEPA Planner	Project manager, plan and EIS development
Rosalyn Stewart	Environmental Specialist	Deputy project manager
Maryann Hulsman	Environmental Specialist	Project coordinator
Jill Sunahara	Environmental Specialist	Project coordinator
Technical Staff		
Chris Baker	Graphic Artist	Mapping and information design
Bonnie Chiu	Environmental Specialist	Environmental justice
Karen Crawford	Cultural Resources Specialist	Cultural resources
Steve Daus	Ecologist	BLM planning process
Nelia Dyer	Environmental Specialist	Transportation and land use
Nate Jennings	GIS and Remote Sensing Analyst	GIS and mapping
Joshua Johnson	GIS and Remote Sensing Analyst	GIS and mapping
Nate Martin	Environmental Specialist	Water quality and hydrology
Jeff Peters	Geomorphologist	Geology
Vanessa Rutter	Restoration Specialist	Visual resources
Ryman Simangan	Air Quality and Noise Specialist	Air quality and noise
Jill Sunahara	Environmental Specialist	Comment review and response
Edward West	Senior Wildlife Biologist	Wildlife and ecology
Peer Review Staff		
David Buehler	Acoustical Engineer	Noise and transportation
Leslie Fryman	Senior Historian	Historic preservation and cultural resources management
Jennifer Stock	Restoration Specialist	Visual resources
Lynn Wall	Environmental Engineer	Air quality and hazardous materials
JONES & STOKES SUBCONSULTANTS		
egret, inc.		
Joan Lynn	Technical Editor	Editing
Sara Brennan LaBelle	Editor	Editing and formatting

Individual	Position	Role
Mad River Biologists		
Ron LeValley	Senior Biologist	Wildlife
Heather Beehler	Biologist	Wildlife
Nature Tourism Planning		
Bob Garrison	Owner and Wildlife Recreation and Tourism Specialist	Recreation, tourism, and interpretation

Notes:

AFO = Arcata Field Office.
BFO = Bakersfield Field Office.
CASO = California State Office.
CCNM = California Coastal National Monument.
CDD = California Desert District.
DFG = California Department of Fish and Game.
DPR = California Department of Parks and Recreation.
GIS = Geographic information system.
HFO = Hollister Field Office.
PSSCFO = Palms Springs/South Coast Field Office.
UFO = Ukiah Field Office.
USAF = U.S. Air Force.

Chapter 7 References

7.1 Printed References 7-1
7.2 Personal Communication 7-4

Chapter 7
References

7.1 Printed References

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Chapter 8 Glossary

The glossary defines key terms and concepts in the RMP and EIS. It is intended to increase understanding of the document by clarifying terms that are unique to environmental documentation or those with several potential meanings.

Chapter 8
Glossary

Alternative – One of at least two proposed means of accomplishing planning objectives.

Management Situation Analysis (MSA) – Step 4 in BLM's resource management planning process. An MSA describes a planning area's current public land management and suggests opportunities to better manage this land.

Area of Critical Environmental Concern (ACEC) – An area of BLM-administered land where special management attention is needed to protect and prevent irreparable damage to important historic, cultural, or scenic values; fish and wildlife resources or other natural systems or processes; or to protect life and provide safety from natural hazards.

Best Management Practices (BMPs) – Methods, measures, or practices designed to prevent or reduce water pollution. Not limited to structural and nonstructural controls, and procedures for operations and maintenance. Usually, BMPs are applied as a system of practices rather than a single practice.

BLM-Sensitive Species – See SENSITIVE SPECIES.

Cadastral Survey – A survey relating to land boundaries and subdivisions, made to create units suitable for transfer or to define the limitations of title. It is derived from the word "cadastre," meaning a public record, survey, or map of the value, extent, and ownership of land as a basis of taxation.

California Department of Fish and Game (DFG) – The California state agency that manages Californias fish, wildlife, and plant resources, a nd the habitats upon which they depend, for their ecological values and for their use and enjoyment by the public.

Category 1 – Taxa for which the U.S. Fish and Wildlife Service (FWS) has substantial information on hand to support proposing the species for listing as threatened or endangered. Listing proposals are either being prepared or have been delayed by higher priority listing work.

Category 2 – Taxa for which FWS has information to indicate that listing is possibly appropriate. Additional information is being collected.

California Coastal National Monument (CCNM) – All unappropriated or unreserved lands and interest in lands owned or controlled by the United States, in the form of islands, rocks, exposed reefs, and pinnacles above mean high tide within 12 nautical miles of the shoreline of the State of California. These lands are scattered throughout the CCNM corridor.

CCNM Corridor – The geographic area in which the rocks and islands that make up the monument are located. This is the area (delineated by Presidential Proclamation No. 7264 that established the CCNM on January 11, 2000) that extends12 nautical miles off of the shoreline of the State of California and encompasses more than 14,600 square nautical miles. Also referred to as the "monument corridor," this is not the CCNM.

CCNM Planning Area – The geographic area covered by the RMP, including all lands regardless of jurisdiction. This area consists of the CCNM corridor plus the California Coastal Commission's Coastal Zone. Delineation of a planning area extending beyond the CCNM boundary helps ensure that the resource values and public use of the CCNM are considered in their proper context as components of California's coastal ecosystems. BLM planning guidance promotes delineation of planning areas at a geographic scale to ensure that issues are addressed in their entirety and to encourage public involvement.

Cooperating Agency – Assists the lead federal agency in developing the environmental analysis for a proposed major action. U.S. Council on Environmental Quality regulations implementing NEPA define a cooperating agency as any agency that has jurisdiction by law or special expertise for proposals covered by NEPA. Any North American Indian tribe or federal, state, or local government jurisdiction with such qualifications may become a cooperating agency by agreement with the lead agency. Cooperating agency status is generally formalized through a memorandum of understanding (MOU) between BLM and the cooperating agency.

Consistency – Under the FLPMA, the adherence of BLM resource management plans to the terms, conditions, and decisions of officially approved and adopted resource related plans, or in their absence, with policies and programs of other federal agencies, state and local governments and Indian tribes, so long as the plans are also consistent with the purposes, policies and programs of federal laws and regulations applicable to BLM-administered lands.

Critical Habitat – Under the Endangered Species Act, (1) the specific areas within the geographic area occupied by a federally listed species on which are found physical and biological features essential to the conservation of the species, and that may require special management considerations or protection; and (2) specific areas outside the geographic area occupied by a listed species when it is determined that such areas are essential for the conservation of the species.

Cultural Resource – Any definite location of past human activity identifiable through field survey, historical documentation, or oral evidence. Includes archaeological or architectural sites, structures, or places; and places of traditional cultural or religious importance to specified groups whether or not represented by physical remains.

Cultural Resource Data – Cultural resource information embodied in material remains and manifested in studies, notes, records, diaries, analyses, and published and unpublished manuscripts.

Cultural Resource Inventory (Survey) – A descriptive listing and documentation including photographs and maps of cultural resources. Included in an inventory are the processes of locating, identifying, and recording sites, structures, buildings, objects, and districts through library and archival research, information from persons knowledgeable about cultural resources, and on-the-ground surveys of varying intensity. The three classes, or levels, of cultural resource inventories (surveys) are:

Class I. A professionally prepared study that compiles, analyzes, and synthesizes all available data on an area's cultural resources. Information sources for this study include published and unpublished documents, BLM inventory records, institutional site files, and state and National Register files. Class I inventories may have prehistoric, historic, and ethnological and sociological elements. These inventories are periodically updated to include new data from other studies and Class II and III inventories.

Class II. A professionally conducted, statistically based sample survey designed to describe the probable density, diversity, and distribution of cultural properties in a large area. This survey is achieved by projecting the results of an intensive survey carried out over limited parts of the target area. Within individual sample units, survey aims, methods, and intensities are the same as those applied in Class III inventories. To improve statistical reliability, Class II inventories may be conducted in several phases with different sample designs.

Class III. A professionally conducted intensive survey of an entire target area aimed at locating and recording all visible cultural properties. In a Class III survey, trained observers commonly conduct systematic inspections by walking a series of close-interval parallel transects until they have thoroughly examined an area.

Disposition – A transaction that leads to the transfer of title of public lands, and/or resources upon or in these lands, from the Federal Government.

Disturbance – A natural or human-induced environmental change that alters one or more of the floral, faunal, or microbial communities within the ecosystem. Disturbance to wildlife is anything that causes them to deviate from their normal activities such that it makes it difficult to complete their life cycles.

Ecological Health – The condition of an ecosystem in which processes and functions are adequate to maintain diversity of biotic communities commensurate with those initially found there.

Effect – Interpreted under NEPA to indicate reasonably foreseeable effects from a proposed project to ecological, aesthetic, historic, cultural, economic, social, or health, or other resources. Impacts may be beneficial or detrimental (adverse), or possibly both. Impacts may be considered as direct, indirect, or cumulative:

Direct. Caused by an action occurring at the same time and place.

Indirect. Caused by the proposed action and occurring later in time or farther removed in distance, but are still reasonably foreseeable.

Cumulative. Resulting from the incremental effect of the action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency or person undertakes such other actions.

Endangered Species – Any species defined through the Endangered Species Act as being in danger of extinction throughout all or a significant portion of its range and published in the *Federal Register.*

Endemic – Native to a well-defined geographic area and restricted to that area.

Entry – An application to acquire title to public lands.

Environmental Impact Statement (EIS) – A formal, analytical document required by NEPA that considers significant environmental impacts expected from implementation of a major federal action.

Environmental Justice – The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income in developing, implementing, and enforcing environmental laws, regulations, and policies.

Exchange – A type of disposition. An exchange is a transaction whereby the Federal government receives land or interests in lands in exchange for other land or interest in lands. Exchanges are equal value for equal value, not acre for acre.

Federal Land Policy and Management Act (FLPMA) – The act that: (1) established, for the BLM, standards for managing the public lands including land use planning, sales, withdrawals, acquisitions, and exchanges; (2) authorized the setting up of local advisory councils representing major citizens groups interested in land use planning and management, (3) established criteria for reviewing proposed wilderness areas, and (4) provided guidelines for other aspects of public land management such as grazing.

Interim Management – Temporary management of the monument conducted until such a time as resource areas are designated and management actions are in place for all rocks and islands.

Intertidal Zone – The area exposed at low tides and inundated at high tides; defined as the area between extreme low tide and extreme high tide. The extent of the intertidal zone is variable based on local conditions such as exposure to wave action. The intertidal zone is host to a variety of biota that are adapted to the varying amounts of inundation, the composition of which changes depending on position in the intertidal zone (e.g., some species are only found in the low intertidal or high intertidal zones).

Invasive Species – Plant or wildlife species that were either absent or present only in small amounts in undisturbed portions of a specific site's original habitat but that invade and/or proliferate following disturbance or continued overuse. Invasive species often have a deleterious effect on natural resources and/or human uses of these resources.

Landscape – A heterogeneous land area with interacting ecosystems that are repeated in similar form throughout.

Landscape Features – The land and water form, vegetation, and structures that compose the characteristic landscape.

Land Use Allocations – Allocations that define allowable uses/activities, restricted uses/activities, and prohibited uses/activities. They may be expressed in terms of area such as acres or miles. Each allocation is associated with a specific management objective.

Land Use Authorization – BLM's authorizing through rights-of-way, leases, land use permits, and easements of uses of the public land.

Leasable Minerals – Minerals whose extraction from federally managed land requires a lease and the payment of royalties. Leasable minerals include coal, oil and gas, oil shale and tar sands, potash, phosphate, sodium, and geothermal steam.

Locatable Minerals – "Handrock" minerals, including—but not limited to—copper, lead, zinc, magnesium, nickel, tungsten, gold, silver, bentonite, barite, feldspar, flourspar, and uranium.

Location – Applies to "locatable minerals" under the Mining Law of 1872 and refers to "whatever are recognized as mineral by the standard authorities, whether metallic or other substances, and are found in sufficient quantity to justify their location under the Mining Law...".

Management Actions/Direction – Measures planned to achieve the stated objectives.

Management Activity – An activity undertaken for the purpose of harvesting, traversing, transporting, protecting, changing, replenishing, or otherwise using resources.

Management Zones – Designated resources areas where specific management actions/measures will be applied.

Mean High Tide – The average of all high tides. Mean high tide varies by location based on local tidal patterns.

Mineral Materials – Materials such as common varieties of sand, stone, gravel, pumice, pumicite, and clay that are not obtainable under the mining or leasing laws but that can be acquired under the Mineral Materials Act of 1947, as amended.

Mineral Withdrawal – Removal or withholding of public mineral estate by statute, Executive Order, Secretarial Order, or Public Land Order from operation of the public mining laws.

Monitoring – The process of collecting information to evaluate if objectives and anticipated or assumed results of a management plan are being realized or if implementation is proceeding as planned.

Monument Corridor – See CCNM CORRIDOR.

Multiple Use – A combination of balanced and diverse resource uses that considers long-term needs for renewable and nonrenewable resources including recreation, wildlife, rangeland, timber, minerals, and watershed protection, along with scenic, scientific, and cultural values.

National Environmental Policy Act (NEPA) – The federal law, effective January 1, 1970, that established a national policy for the environment and requires federal agencies: (1) to become aware of the environmental ramifications of their proposed actions, (2) to fully disclose to the public proposed federal actions and provide a mechanism for public input to federal decision making, and (3) to prepare environmental impact statements for every major action that would significantly affect the quality of the human environment.

National Historic Preservation Act of 1966, as Amended (NHPA) – A federal statute that established a federal program to further the efforts of private agencies and individuals in preserving the Nation's historic and cultural foundations. The NHPA: (1) authorized the NRHP, (2) established the Advisory Council on Historic Preservation and a National Trust Fund to administer grants for historic preservation, and (3) authorized the development of regulations to require federal agencies to consider the effects of federally assisted activities on properties included on or eligible for the NRHP.

National Register of Historic Places (NRHP) – The official list, established by the National Historic Preservation Act, of the Nation's cultural resources worthy of preservation. The NRHP lists archeological, historic, and architectural properties (i.e., districts, sites, buildings, structures, and objects) nominated for their local, state, or national significance by federal and state agencies and approved by the National Register Staff. The National Park Service maintains the NRHP.

Nonpoint Source Pollution (Water) – Pollution sources that are diffuse and do not have a single point of origin or are not introduced into a receiving water body from a specific outlet. These pollutants are generally carried off the land by storm water runoff from such sources as farming, forestry, mining, urban land uses, construction, and land disposal.

Noxious Plant – An unwanted plant specified by federal or state laws as being undesirable and requiring control. Noxious weeds are usually nonnatives and highly invasive.

Objectives – Expressions of the desired end results of management efforts.

Off-Highway Vehicle (OHV) – Any motorized track or wheeled vehicle designed for cross country travel over natural terrain. OHVs exclude: (1) any non-amphibious registered motorboat; (2) any fire, emergency, or law enforcement vehicle while being used for official or emergency purposes; and (3) any vehicle whose use is expressly authorized by a permit, lease, license, agreement, or contract issued by an authorized officer or otherwise approved. (The term "off-highway vehicle" is used in place of the term "off-road vehicle" to comply with the purposes of Executive Orders 11644 and 11989. The definition for both terms is the same.)

Particulate Matter – Fine liquid (other than water) or solid particles suspended in the air, consisting of dust, smoke, fumes, and compounds containing sulfur, nitrogen, and metals.

Passive Recreation – Activities that do not directly or adversely affect monument resources, such as wildlife viewing, photography and painting, and appropriate water sports (including swimming, kayaking, and sailing), from the mainland or adjacent waters.

Patent – A document that conveys legal title to public lands to the patentee. Public domain lands are patented, while acquired lands are deeded by the Government.

Permit – A revocable authorization to use public lands for a specified purpose for up to 3 years.

Proposed Threatened or Endangered Species – Plant or animal species proposed by the U.S. Fish and Wildlife Service to be biologically appropriate for listing as threatened or endangered and that is published in the *Federal Register*. It is not a final designation.

Record of Decision – A document signed by a responsible official recording a decision that was preceded by preparation of an environmental impact statement.

Recreation – The enjoyment of scenery, water, primitive or natural landscape, wildlife, natural phenomena, and archeological and historical sites in one's leisure time.

Resource Management Plan (RMP) – A BLM planning document that is prepared in accord with Section 202 of the FLPMA and that presents systematic guidelines for making resource management decisions for a resource area. An RMP is based on an analysis of an area's resources, their existing management, and their capability for alternative uses. RMPs are issue-oriented and developed by an interdisciplinary team with public participation.

Right-of-Way – A permit or an easement that authorizes the use of public lands for specified purposes—such as pipelines, roads, telephone lines, electric lines, communication sites, reservoirs—and the lands covered by such an easement or permit, within a specific time frame, usually with an option of renewing.

Saleable Minerals –Saleable minerals are sand, gravel, stone, soil, and other common-variety mineral materials disposed of through sales at not less than their appraised price or through free-use permits (e.g., sand and gravel to a county roads department).

Scoping – An early and open process for determining the scope of issues to be addressed in an environmental impact statement and the significant issues related to a proposed action.

Sea Stacks – Tiny islands of volcanic rock left standing after waves have eroded the shoreline.

Section 404 Permit – A permit required by the Clean Water Act, under specified circumstances, when dredge or fill material is placed in the waters of the United States, including wetlands.

Section 7 Consultation – The requirement of Section 7 of the Endangered Species Act that all federal agencies consult with the U.S. Fish and Wildlife Service or the National Oceanic and Atmospheric Administration's National Marine Fisheries Service if a proposed action might affect a federally listed species or its critical habitat.

Sensitive Species – All species that are under status review, have small or declining populations, live in unique habitats, or need special management. Sensitive species include threatened, endangered, and proposed species as classified by the U.S. Fish and Wildlife Service.

Sensitive Areas – Sites hosting significant populations of nesting or roosting seabirds or marine mammals.

Special Management Areas – Areas that may need special management, such as management as an ACEC, RNA, environmental education area, or other special category.

Special Recreation Management Area (SRMA) – An area where a commitment has been made to provide specific recreation activity and experience opportunities. These areas usually require a high level of recreation investment and/or management. They include recreation sites, but recreation sites alone do not constitute SRMAs.

Special-Status Species – Plant or animal species falling in any of the following categories:

- Threatened or endangered species,
- Proposed threatened or endangered species,
- Candidate species,
- State-listed species,
- BLM sensitive species, and
- BLM assessment species.

State Historic Preservation Officer (SHPO) – The state official authorized to act as a liaison to the Secretary of the Interior for purposes of implementing the NHPA.

Take – As defined by the Endangered Species Act, "to harass, harm, pursue, hunt, shoot, wound, kill, capture, or collect, or attempt to engage in any such conduct."

Threatened Species – Any species defined through the Endangered Species Act as likely to become endangered within the foreseeable future throughout all or a significant portion of its range, as published in the *Federal Register*.

Vegetation – The collective plant cover, including terrestrial vegetation such as herbaceous plants, trees, and grasses and intertidal vegetation such as seaweeds, algae, and lichens.

Valid Existing Right – A legally binding property right of a person or entity at a particular point in time.

Viable Population – A wildlife or plant population that contains an adequate number of reproductive individuals to appropriately ensure the long-term existence of the species.

Viewshed – The entire area visible from a viewpoint.

Visual Resource Management (VRM) – The inventory and planning actions to identify visual values and establish objectives for managing those values and the management actions to achieve visual management objectives.

Visual Resource Management Classes – Categories assigned to public lands based on scenic quality, sensitivity level, and distance zones. Each class has an objective that prescribes the amount of modification allowed in the landscape. The four classes are:

Class I: The objective of this class is to preserve the existing character of the landscape. This class provides for natural ecological changes; however, it does not preclude very limited management activities. The level of change to the characteristic landscape should be very low and must not attract attention.

Class II: The objective of this class is to retain the existing character of the landscape. The level of change to the characteristic landscape should be low. Management activities may be seen, but should not attract attention of the casual observer. Any change must repeat the basic element of form, line, color, and texture found in the predominant natural features of the characteristic landscape.

Class III: The objective of this class is to partially retain the existing character of the landscape. The level of change to the characteristic landscape should be moderate. Management activities may attract attention but should not dominate the view of the casual observer. Changes should repeat the basic elements found in the predominant natural features of the characteristic landscape.

Class IV: The objective of this class is to provide for management activities that require major modifications of the existing character of the landscape. The level of change to the characteristic landscape can be high. These management activities may dominate the view and be the major focus of the viewer attention. However, every attempt should be made to minimize the impact of these activities through careful location, minimal disturbance, and repeating the basic elements of the characteristic landscape.

Water Quality – The chemical, physical, and biological characteristics of water.

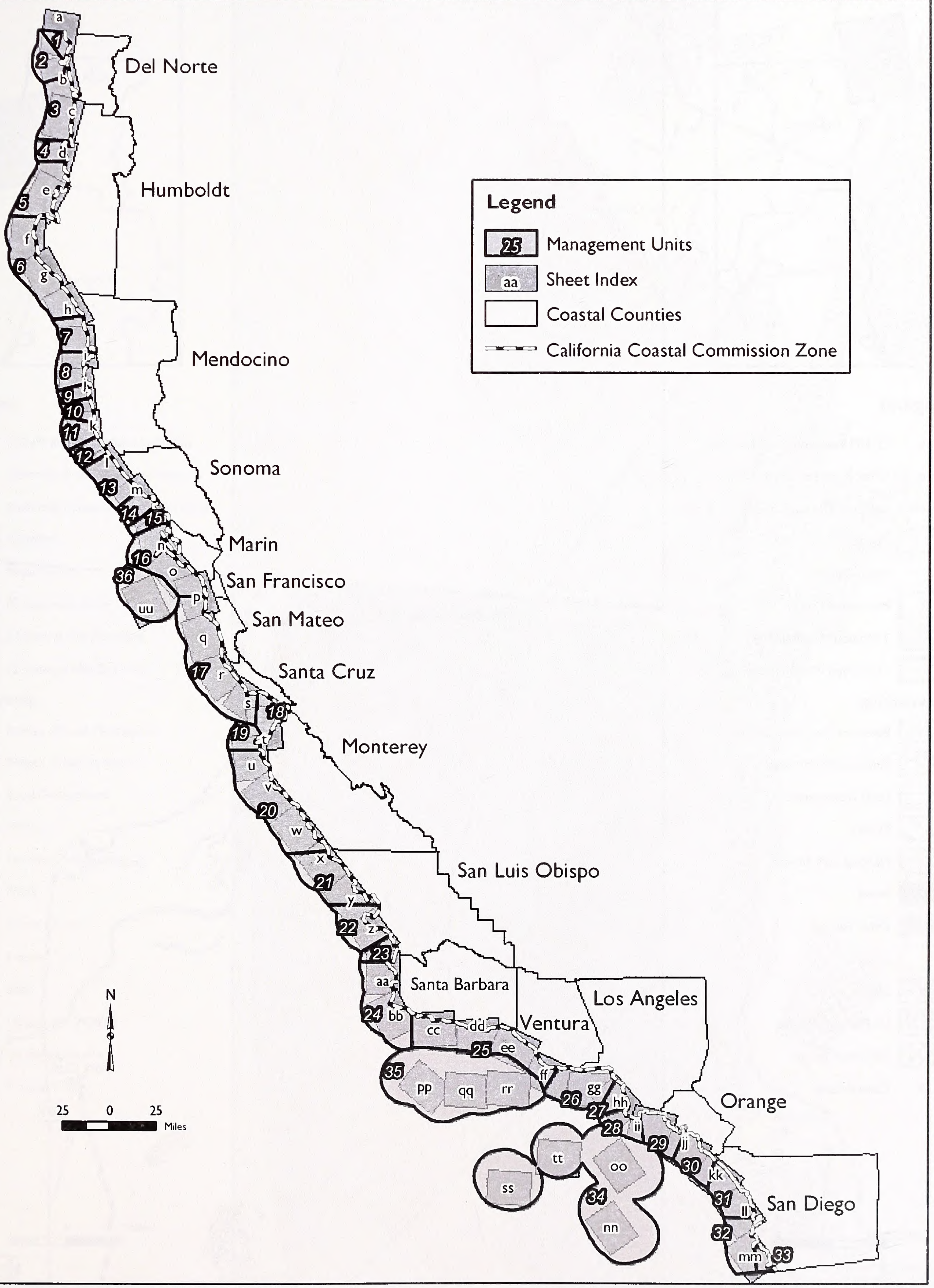
Wetlands or Wetland Habitat – Those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include—but are not limited to—swamps, marshes, bogs, and similar areas.

Wilderness Study Area (WSA) – A roadless area that has been inventoried and found to be wilderness in character, has few human developments, and provides outstanding opportunities for solitude and primitive recreation, as described in Section 603 of the FLPMA and in Section 2(c) of the Wilderness Act of 1964.

Withdrawal – An action that restricts the disposition of public lands and that holds them for a specific public purpose.

Map Atlas

California Coastal National Monument - Sheet Index and Management Units


Del Norte
Humboldt
Mendocino
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San Diego
Legend
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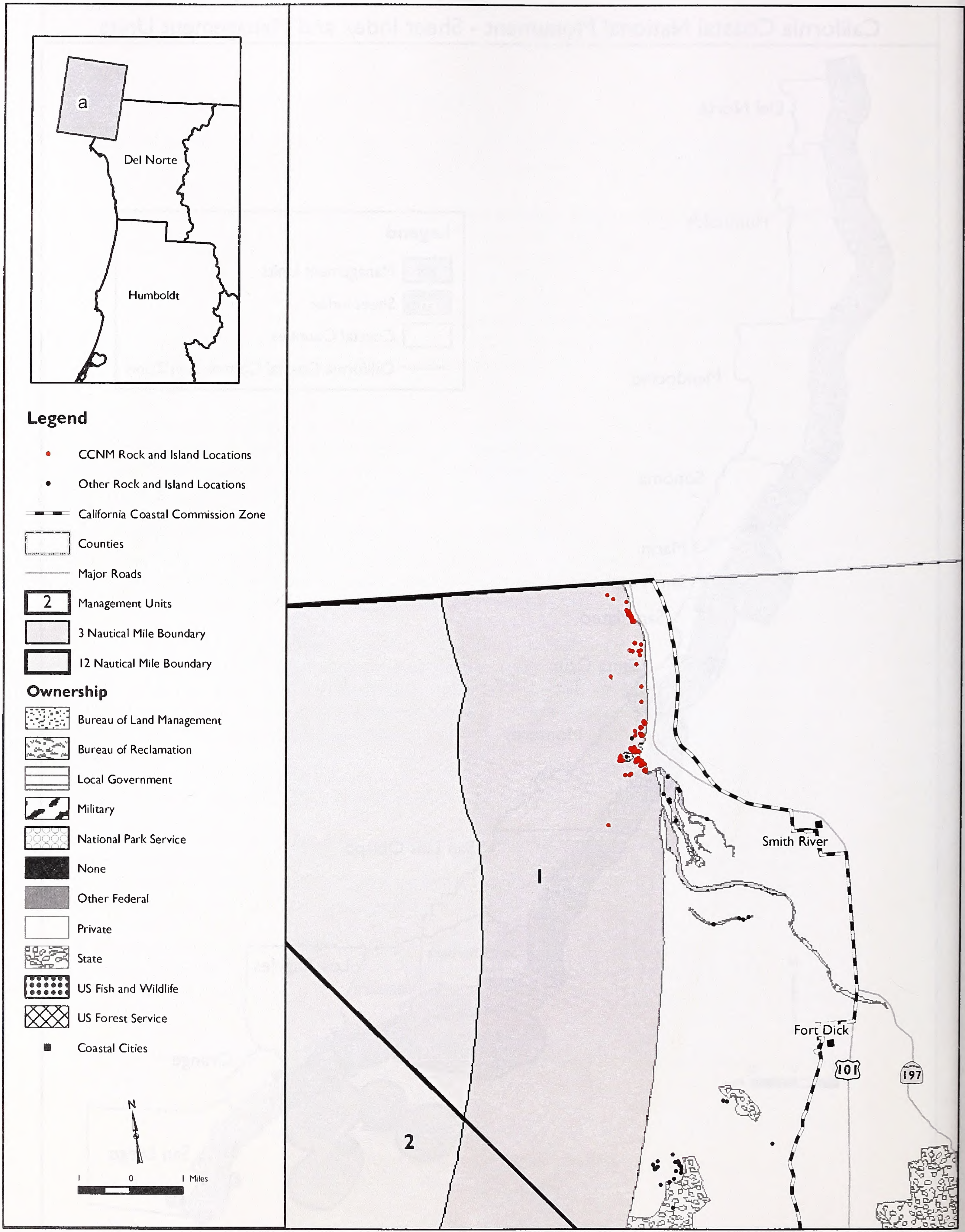
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Del Norte
Humboldt
Legend
CCNM Rock and Island Locations
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
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1 Miles
1
2
Smith River
Fort Dick
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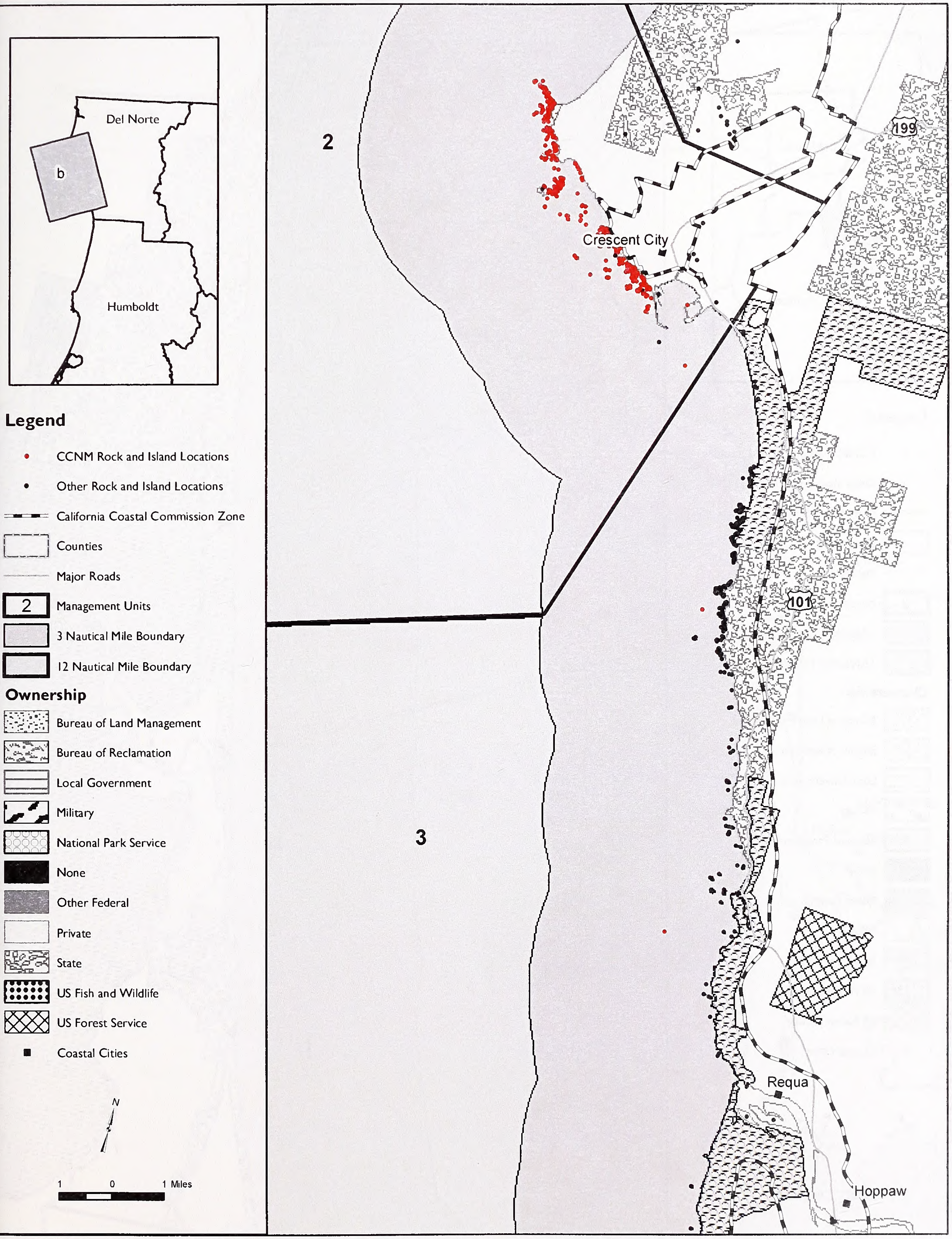
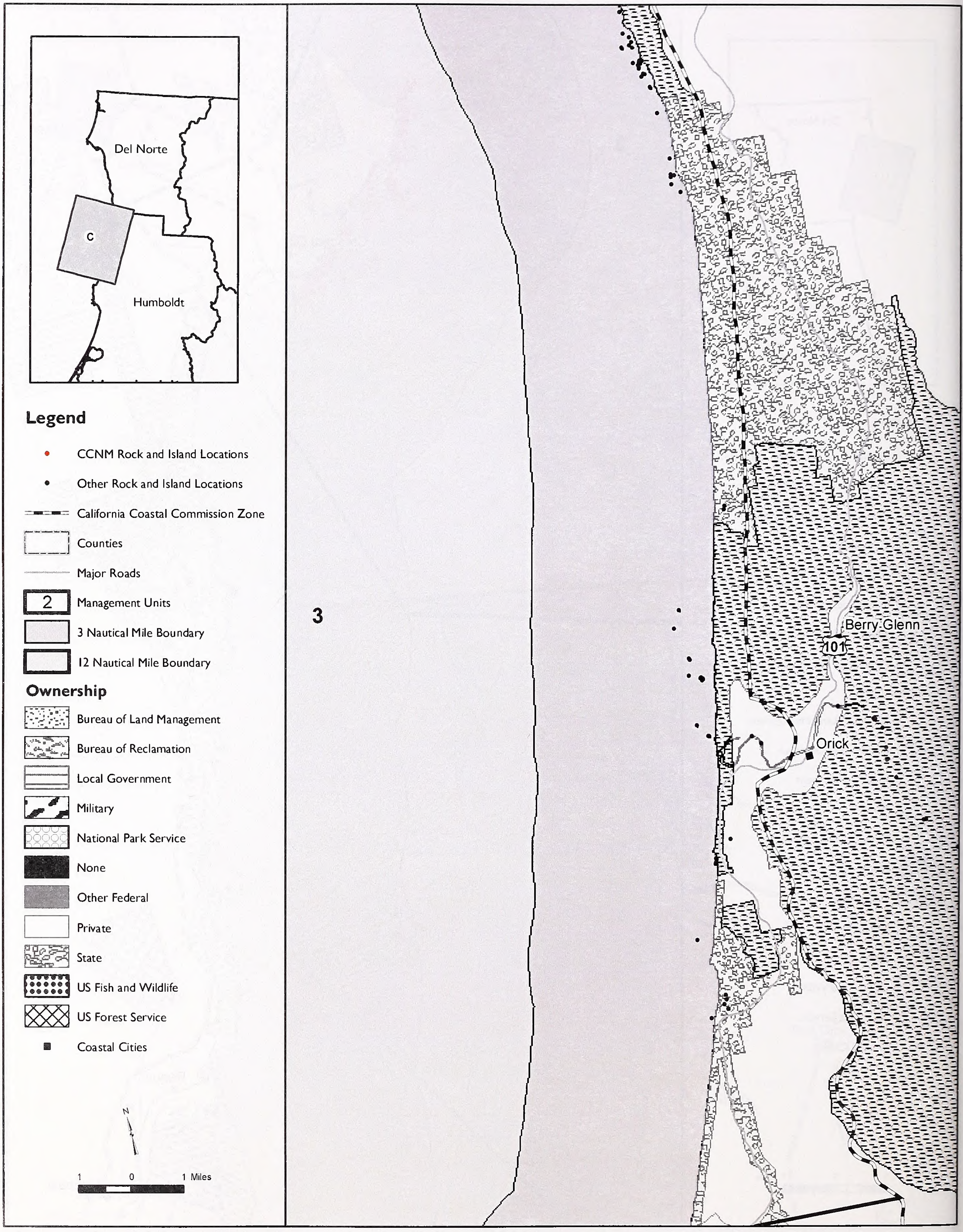
197

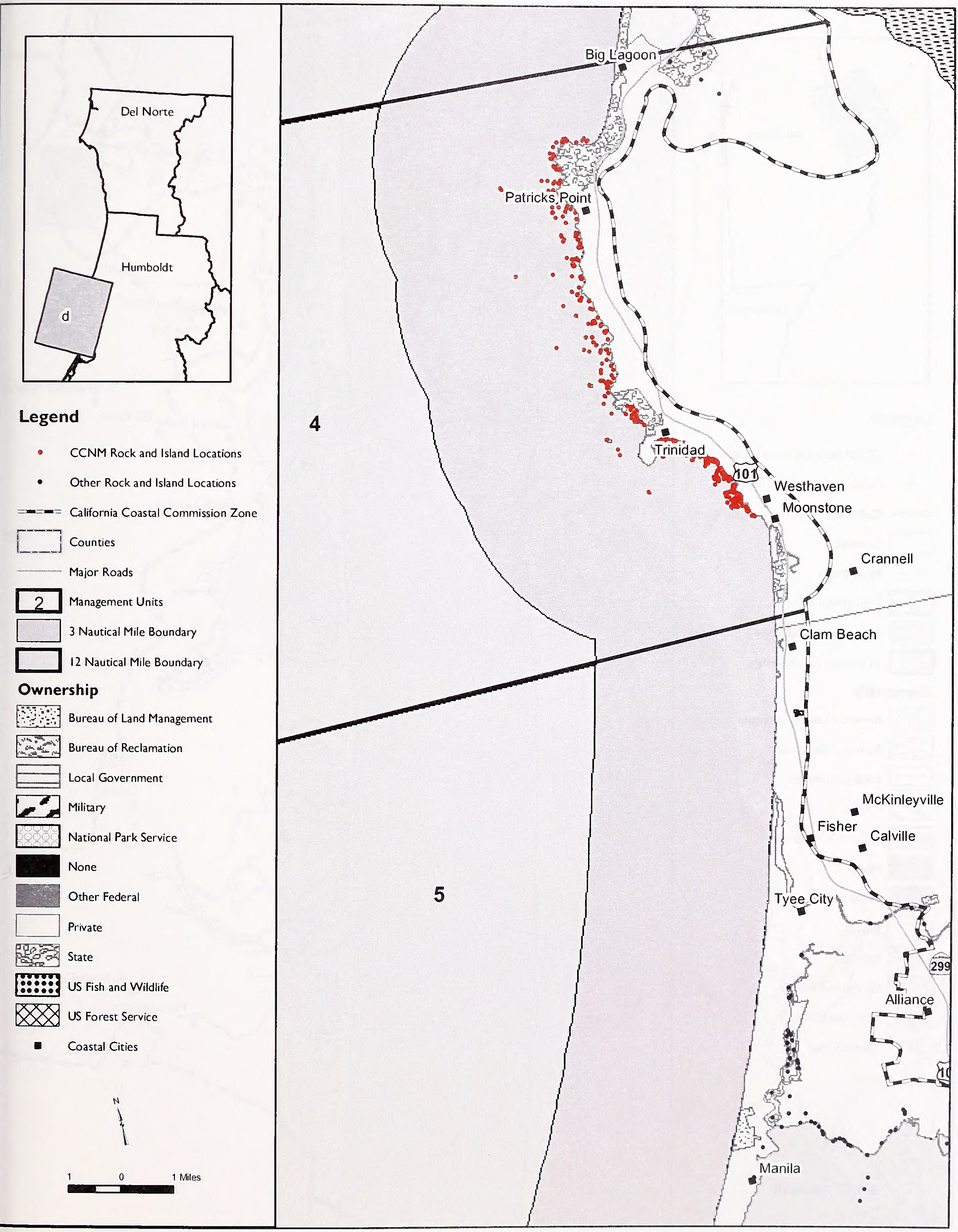
CCNM Sub-Unit 1


Del Norte
b
Humboldt
Legend
● CCNM Rock and Island Locations
● Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2 Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
■ Coastal Cities
N
1 0 1 Miles
2
3
Crescent City
199
101
Requa
Hoppaw

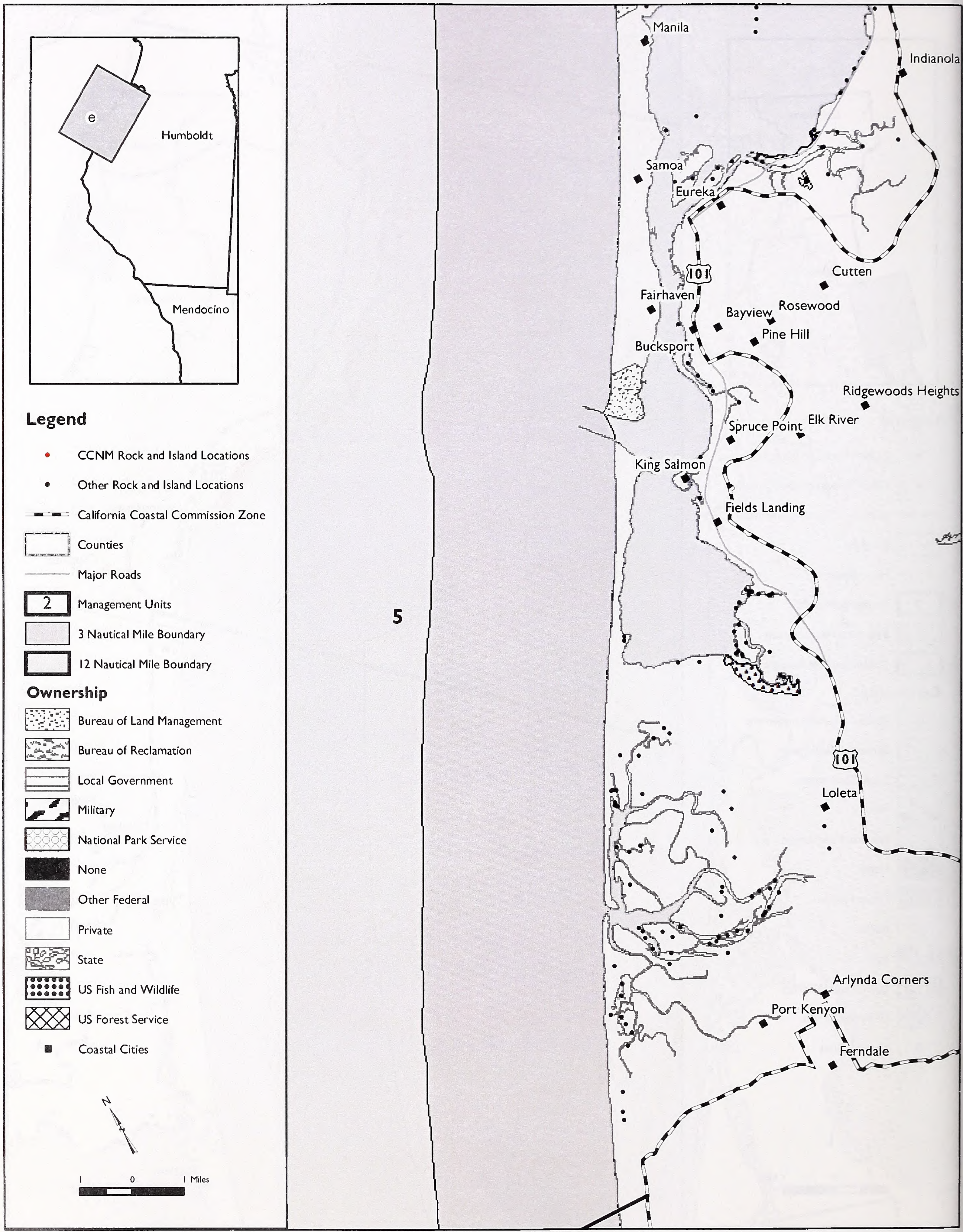
CCNM Sub-Units 2 and 3


Del Norte
C
Humboldt
Legend
CCNM Rock and Island Locations
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1 0 1 Miles
3
Berry Glenn
101
Orick

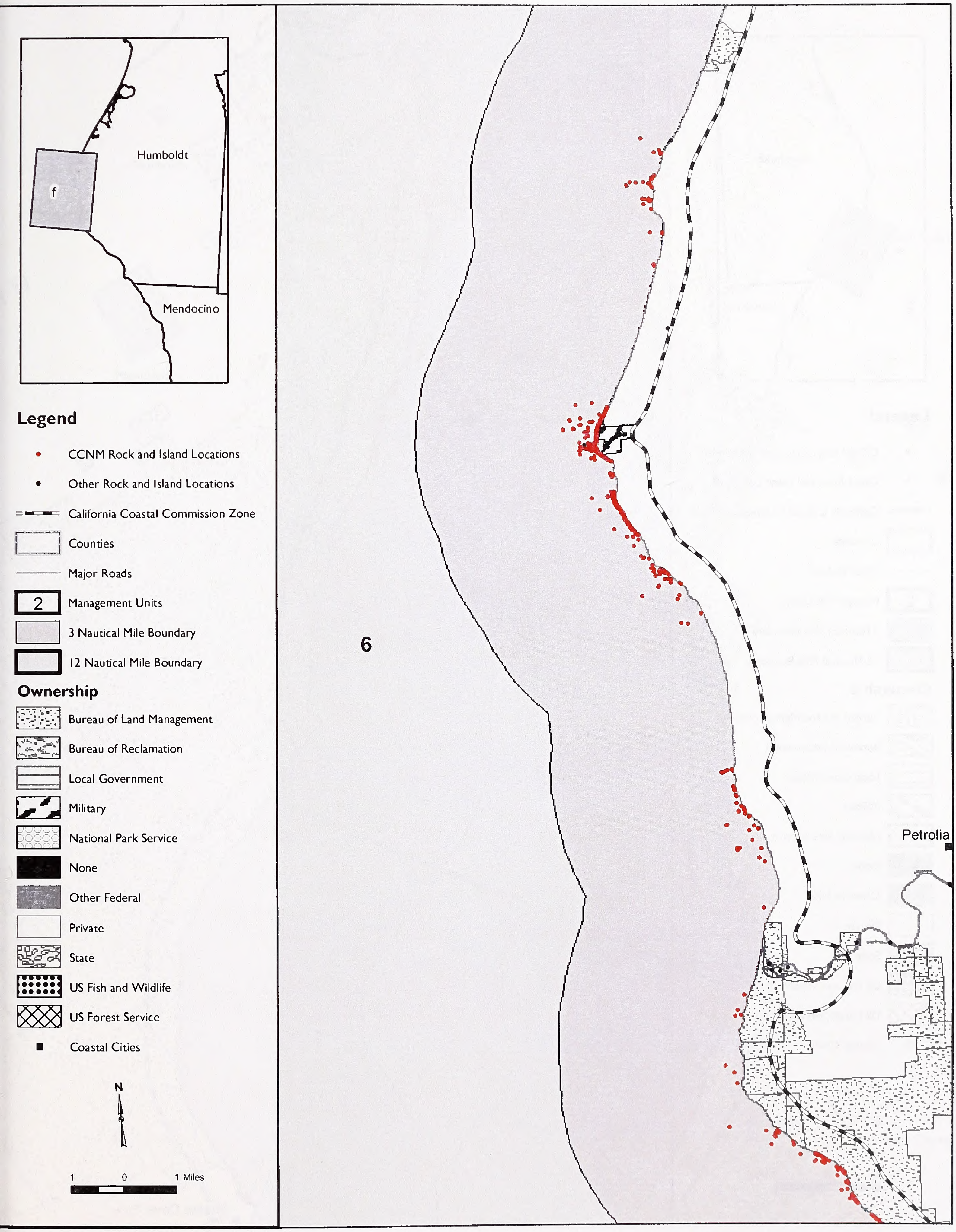
CCNM Sub-Unit 3


Del Norte
Humboldt
d
Legend
CCNM Rock and Island Locations
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1
0
1 Miles
4
5
Big Lagoon
Patricks Point
Trinidad
101
Westhaven
Moonstone
Crannell
Clam Beach
McKinleyville
Fisher
Calville
Tyee City
299
Alliance
Manila

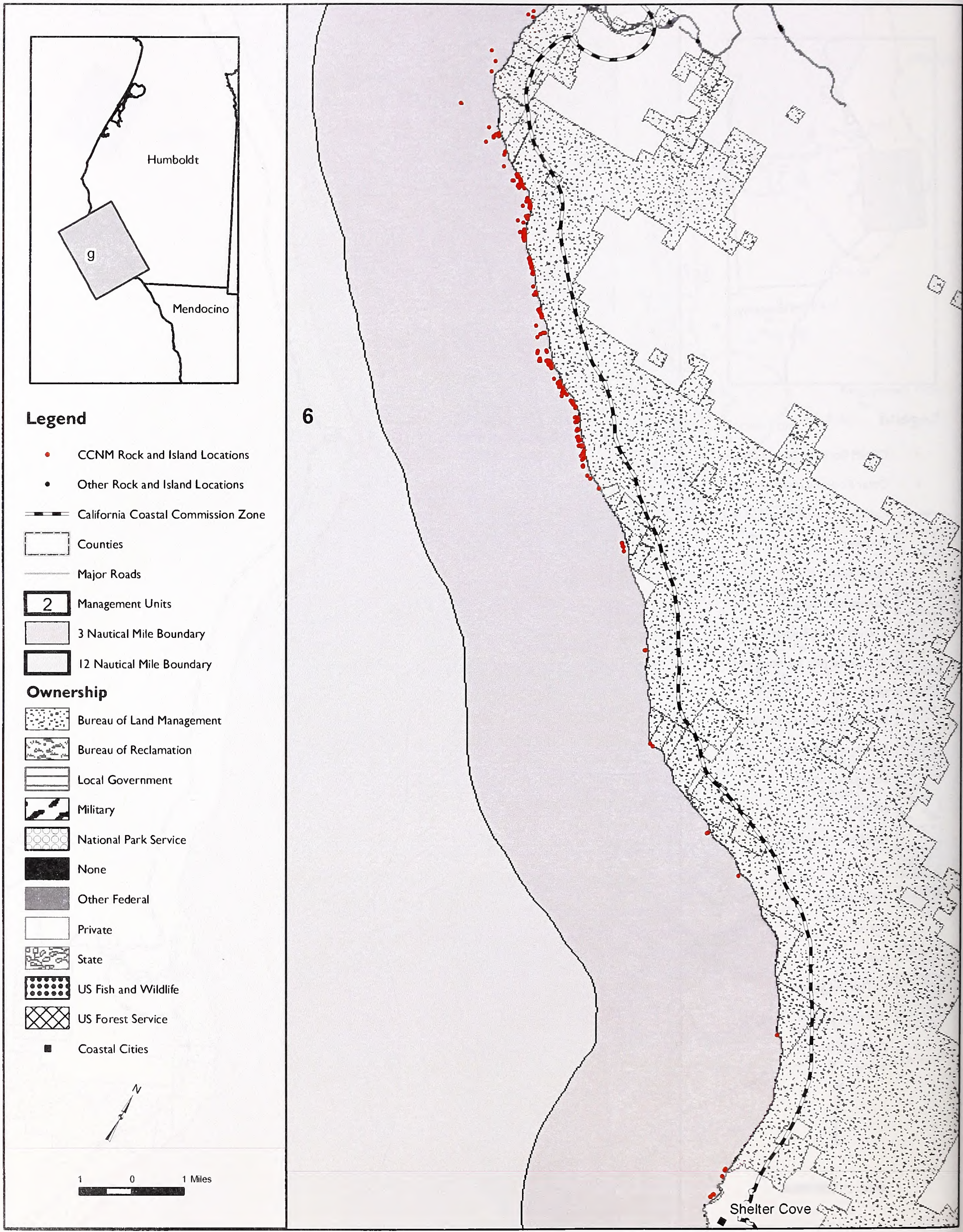
CCNM Sub-Units 4 and 5


e
Humboldt
Mendocino
Legend
CCNM Rock and Island Locations
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1
0
1 Miles
5
Manila
Indianola
Samoa
Eureka
101
Cutten
Fairhaven
Bayview
Rosewood
Pine Hill
Bucksport
Ridgewoods Heights
Spruce Point
Elk River
King Salmon
Fields Landing
101
Loleta
Arlynda Corners
Port Kenyon
Ferndale

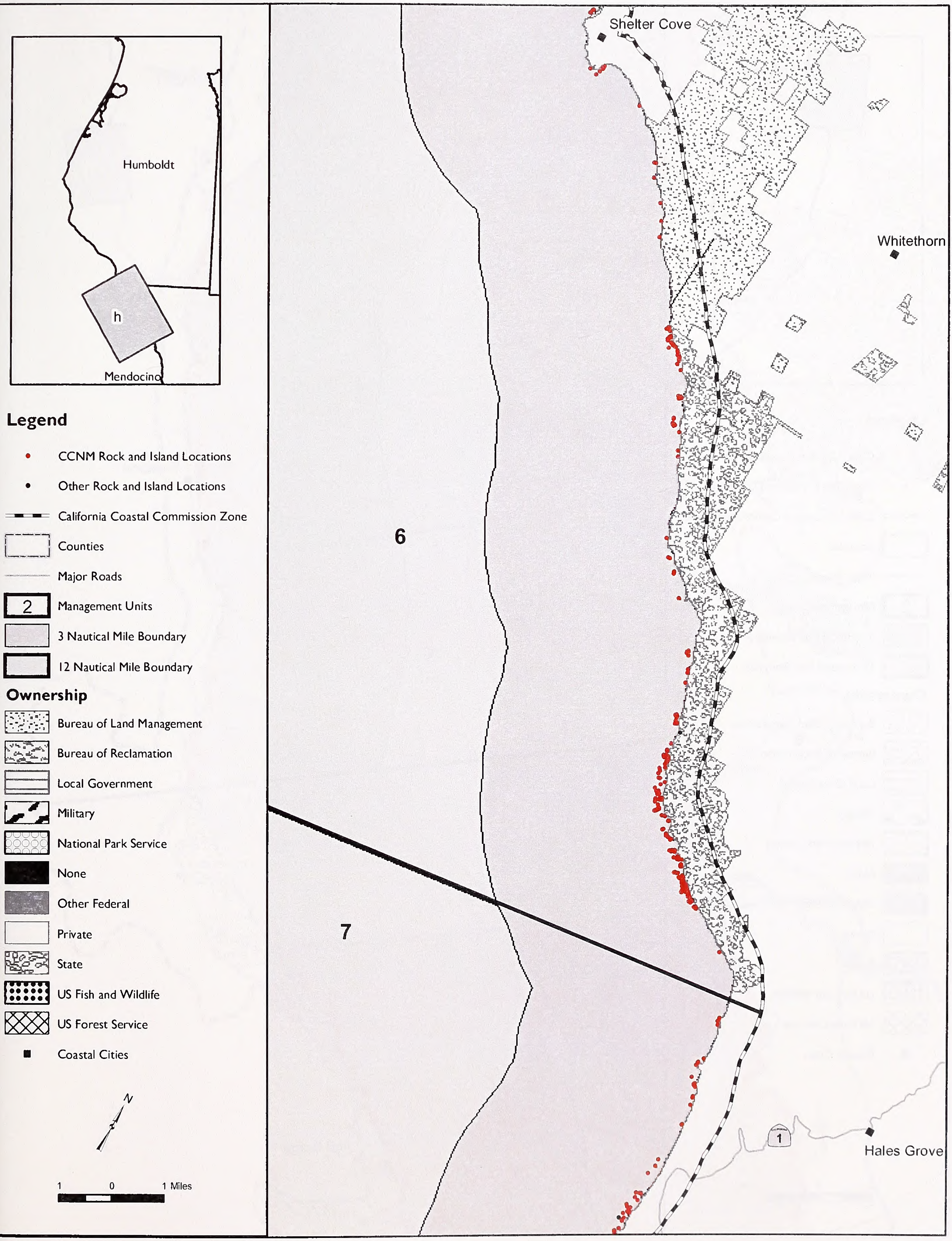
CCNM Sub-Unit 5


Humboldt
f
Mendocino
Legend
CCNM Rock and Island Locations
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1 0 1 Miles
6
Petrolia

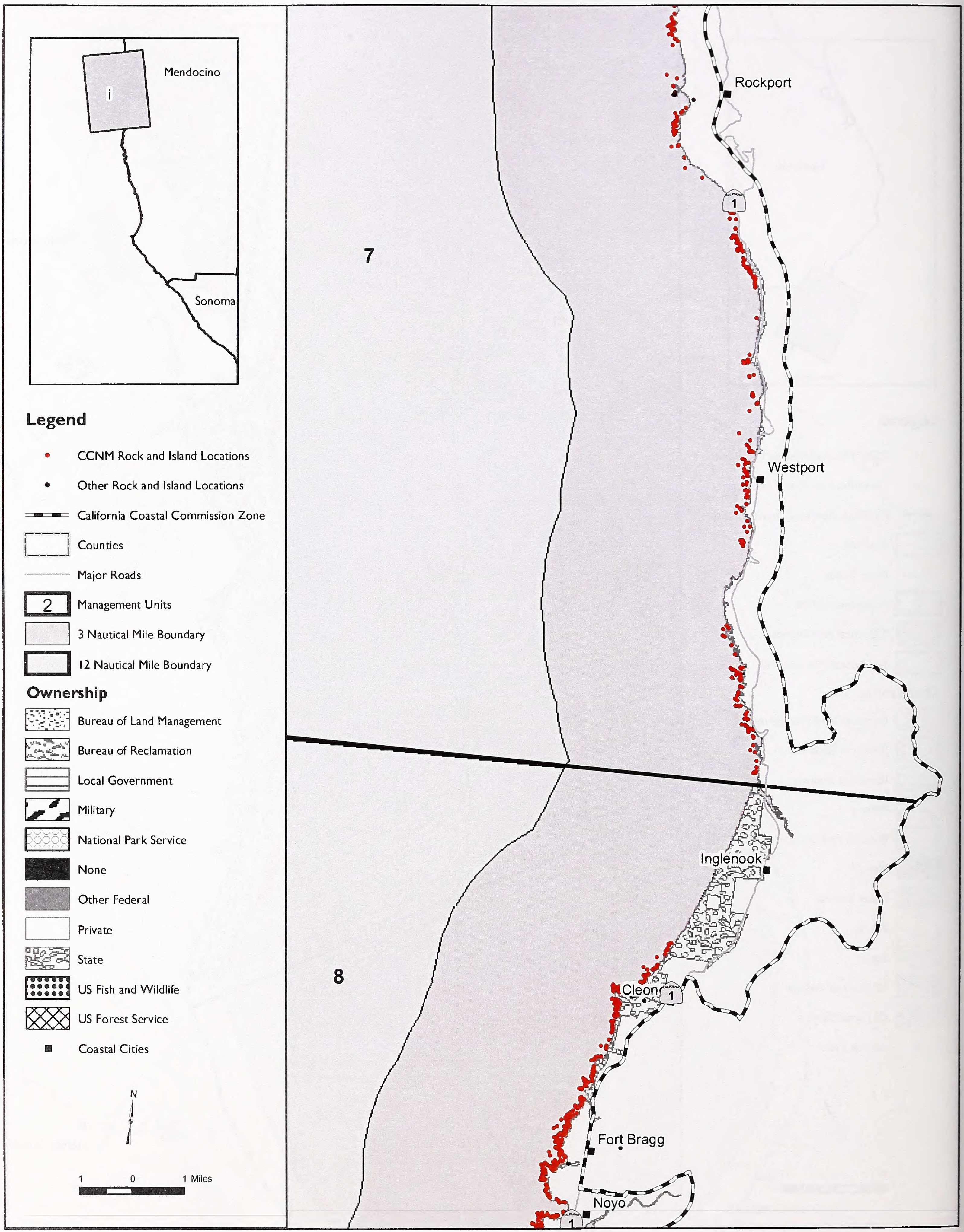
CCNM Sub-Unit 6


Humboldt
g
Mendocino
Legend
CCNM Rock and Island Locations
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1
0
1 Miles
6
Shelter Cove

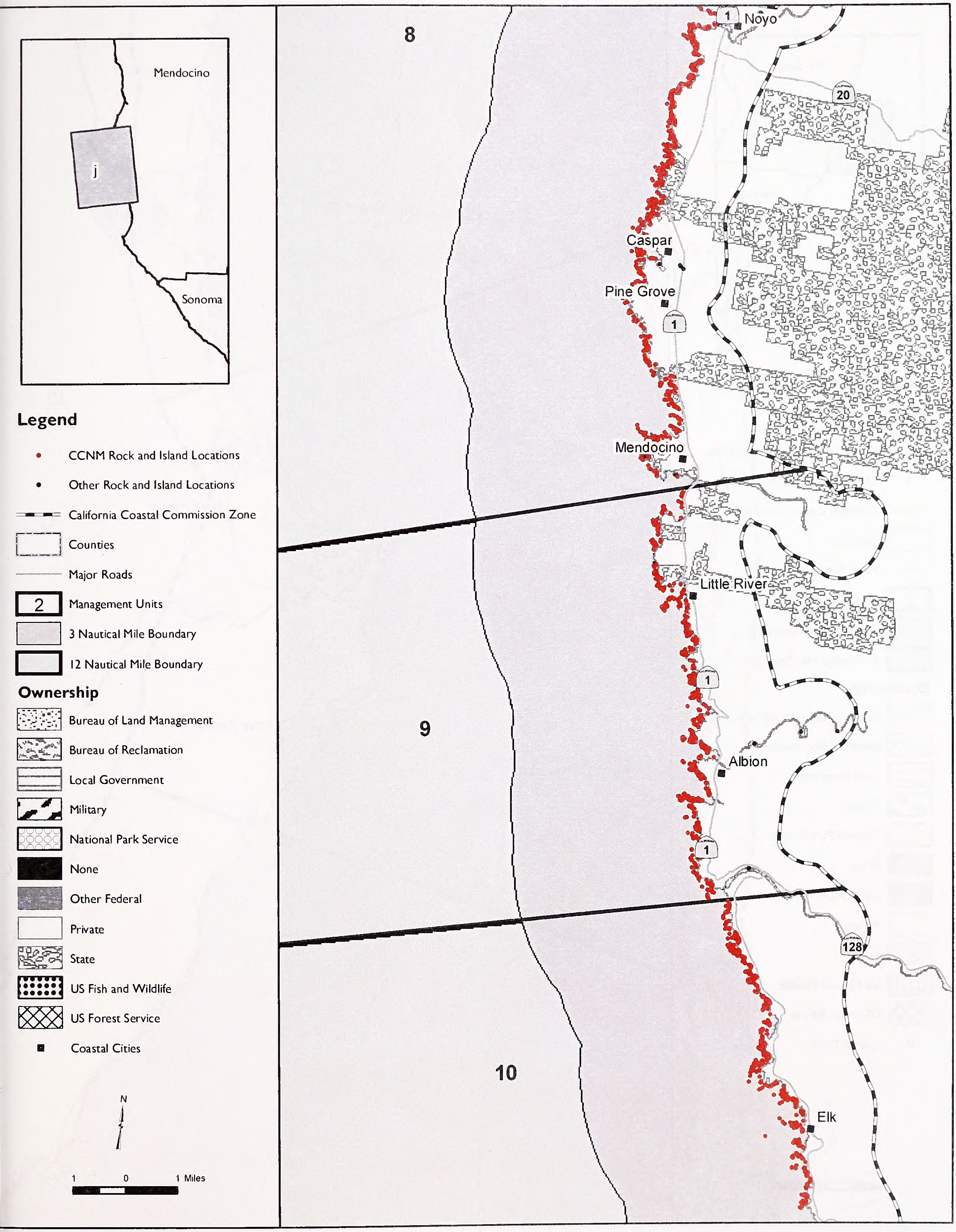
CCNM Sub-Unit 6


Humboldt
h
Mendocino
Legend
CCNM Rock and Island Locations
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1 0 1 Miles
Shelter Cove
Whitethorn
6
7
1
Hales Grove

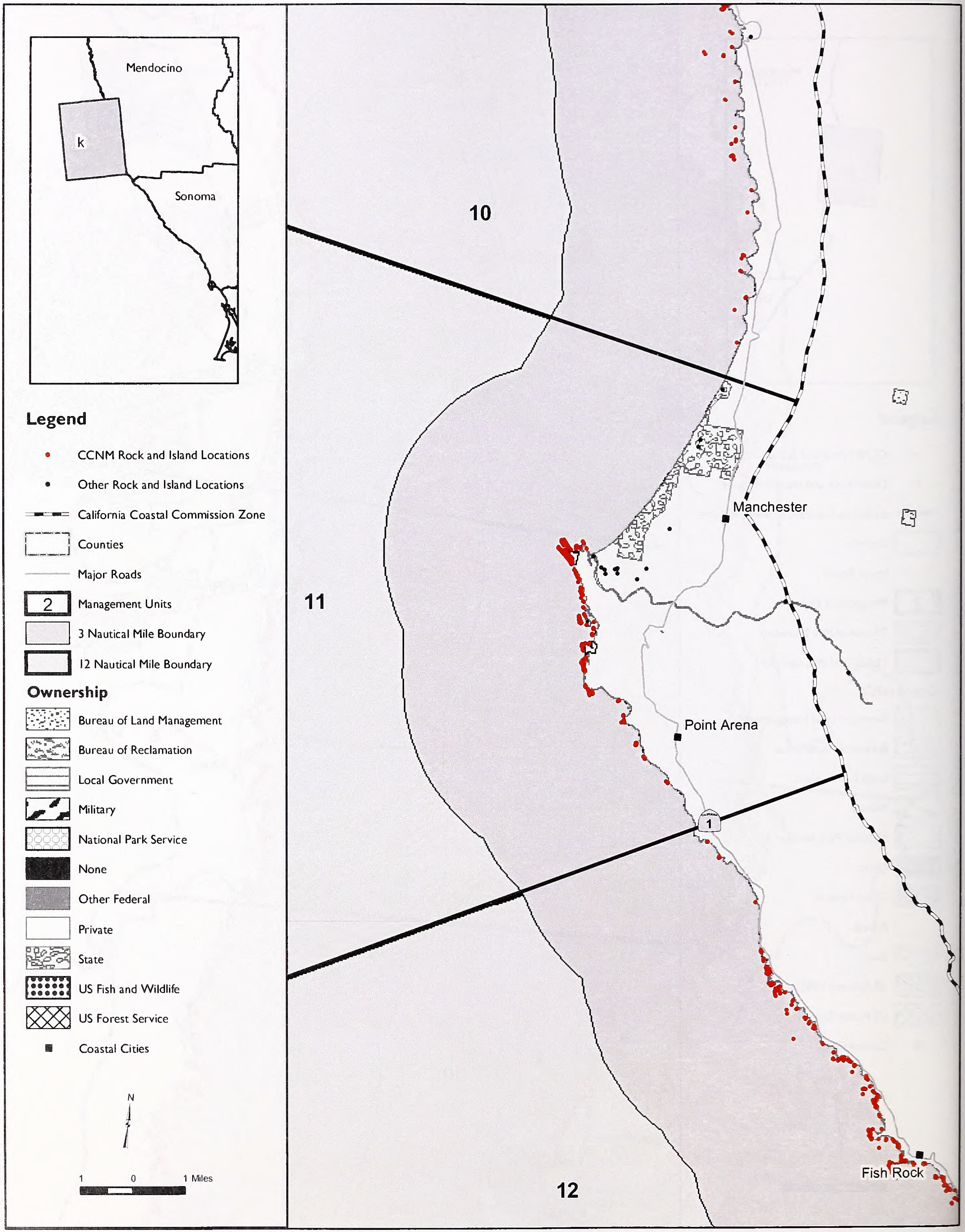
CCNM Sub-Units 6 and 7


Mendocino
i
Sonoma
Legend
CCNM Rock and Island Locations
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1
0
1 Miles
7
8
Rockport
1
Westport
Inglenook
Cleone
1
Fort Bragg
Noyo
1

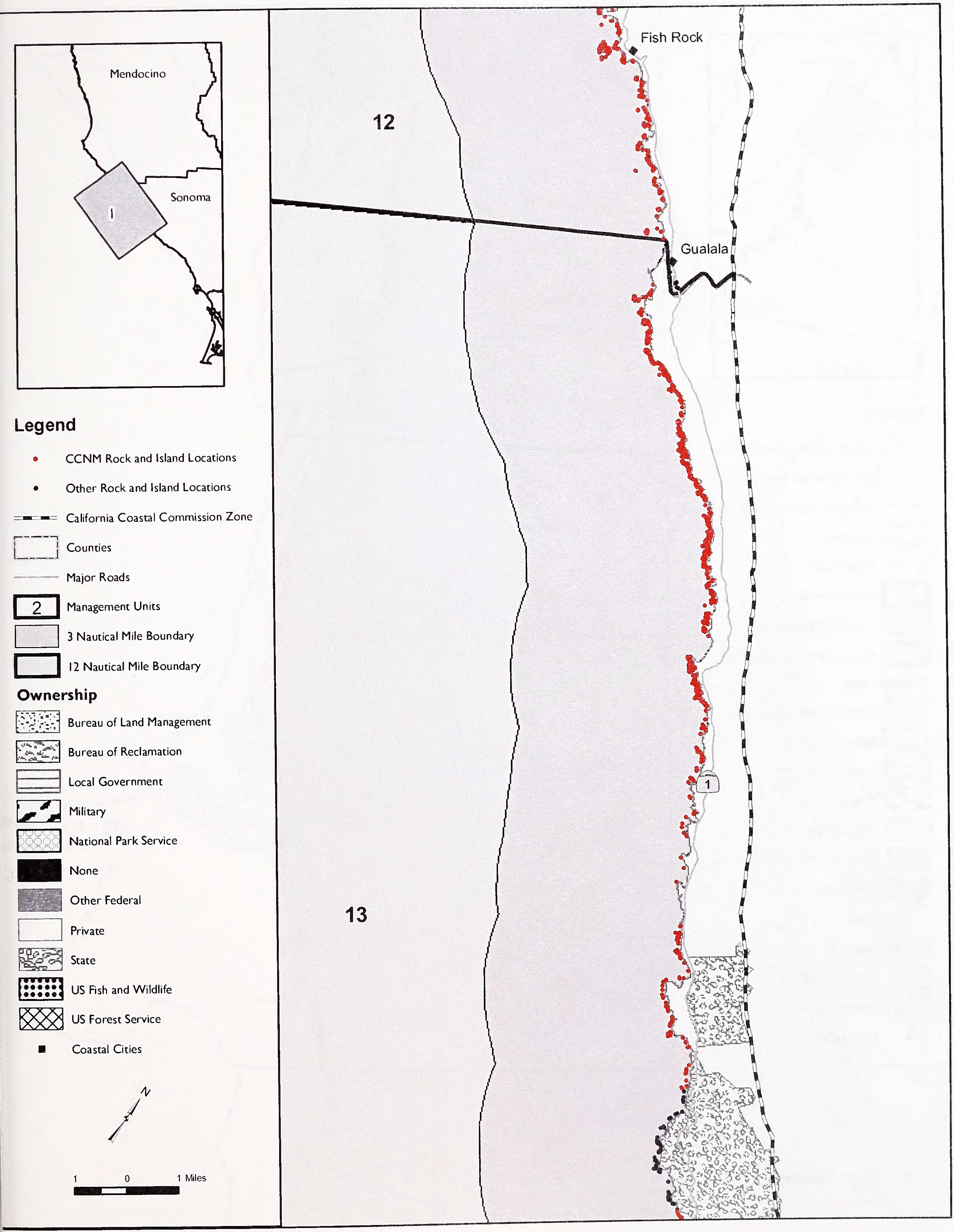
CCNM Sub-Units 7 and 8


Mendocino
Sonoma
j
Legend
CCNM Rock and Island Locations
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2 Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1 0 1 Miles
8
9
10
Noyo
1
20
Caspar
Pine Grove
1
Mendocino
Little River
1
Albion
1
128
Elk

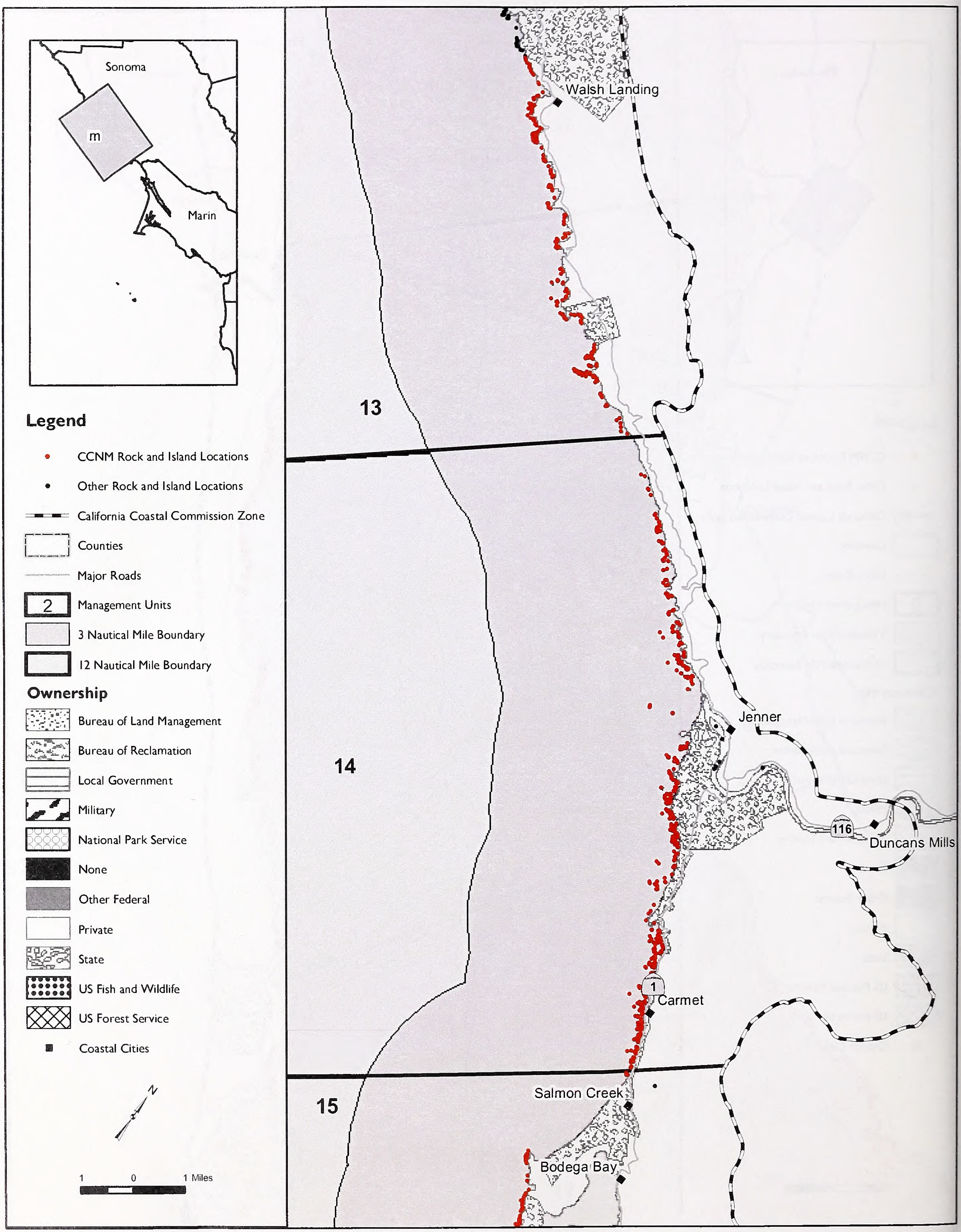
CCNM Sub-Units 8, 9, and 10


Mendocino
k
Sonoma
Legend
CCNM Rock and Island Locations
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2 Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1 0 1 Miles
10
11
12
Manchester
Point Arena
1
Fish Rock

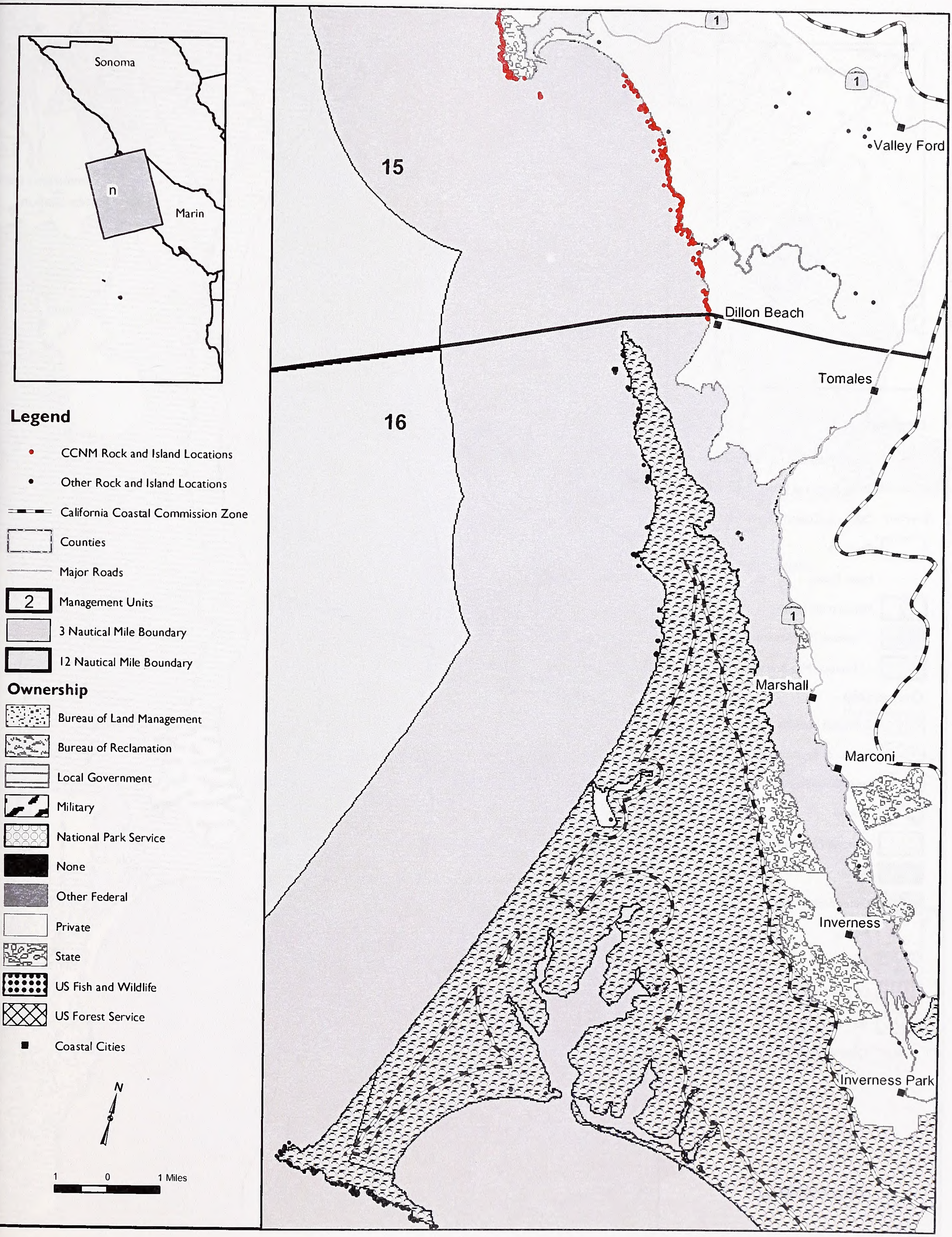
CCNM Sub-Units 10, 11, and 12


Mendocino
Sonoma
1
Fish Rock
12
Gualala
13
1
Legend
CCNM Rock and Island Locations
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1 0 1 Miles

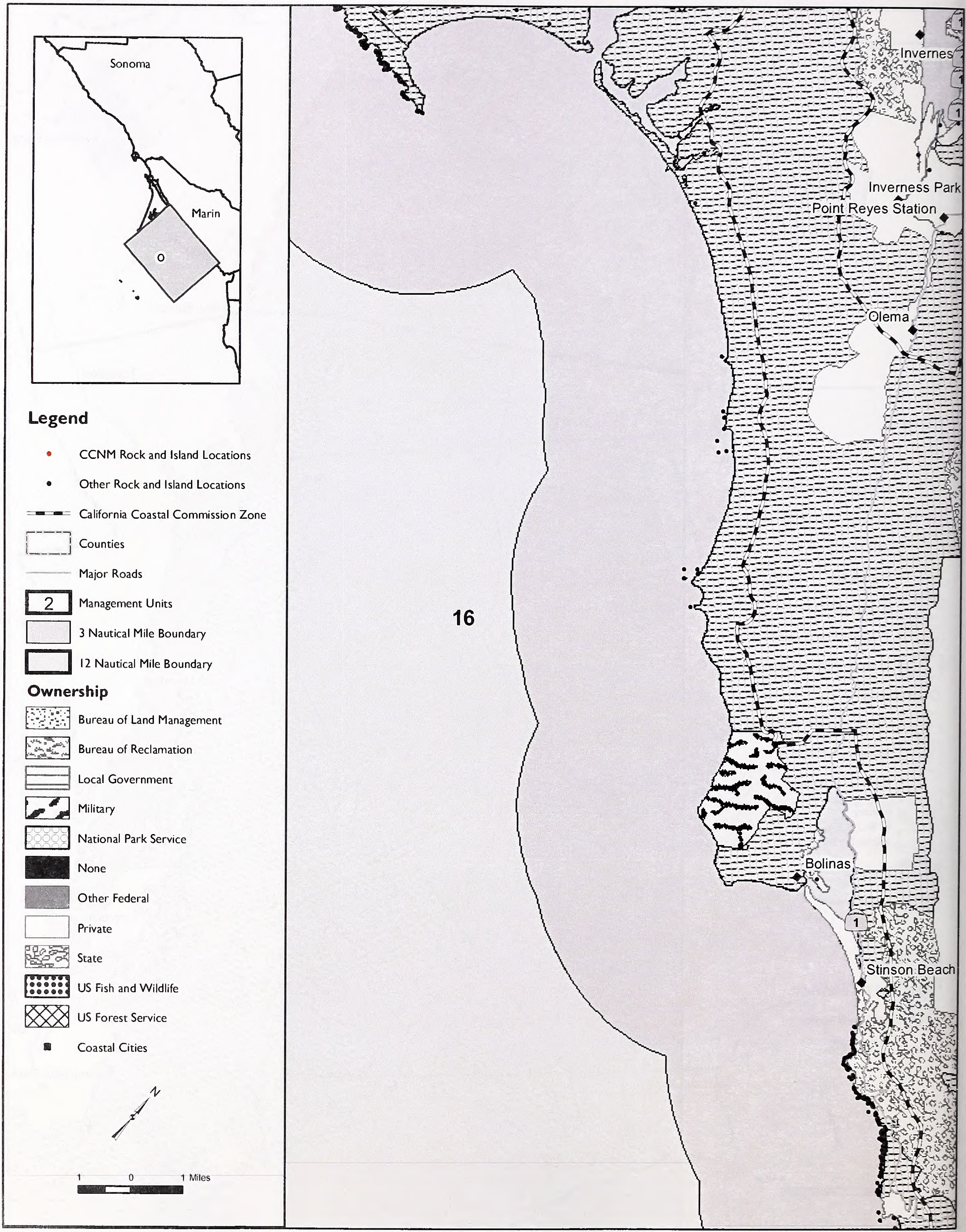
CCNM Sub-Units 12 and 13


Sonoma
m
Marin
Legend
CCNM Rock and Island Locations
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2 Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1
0
1 Miles
13
14
15
Walsh Landing
Jenner
116
Duncans Mills
1
Carmet
Salmon Creek
Bodega Bay

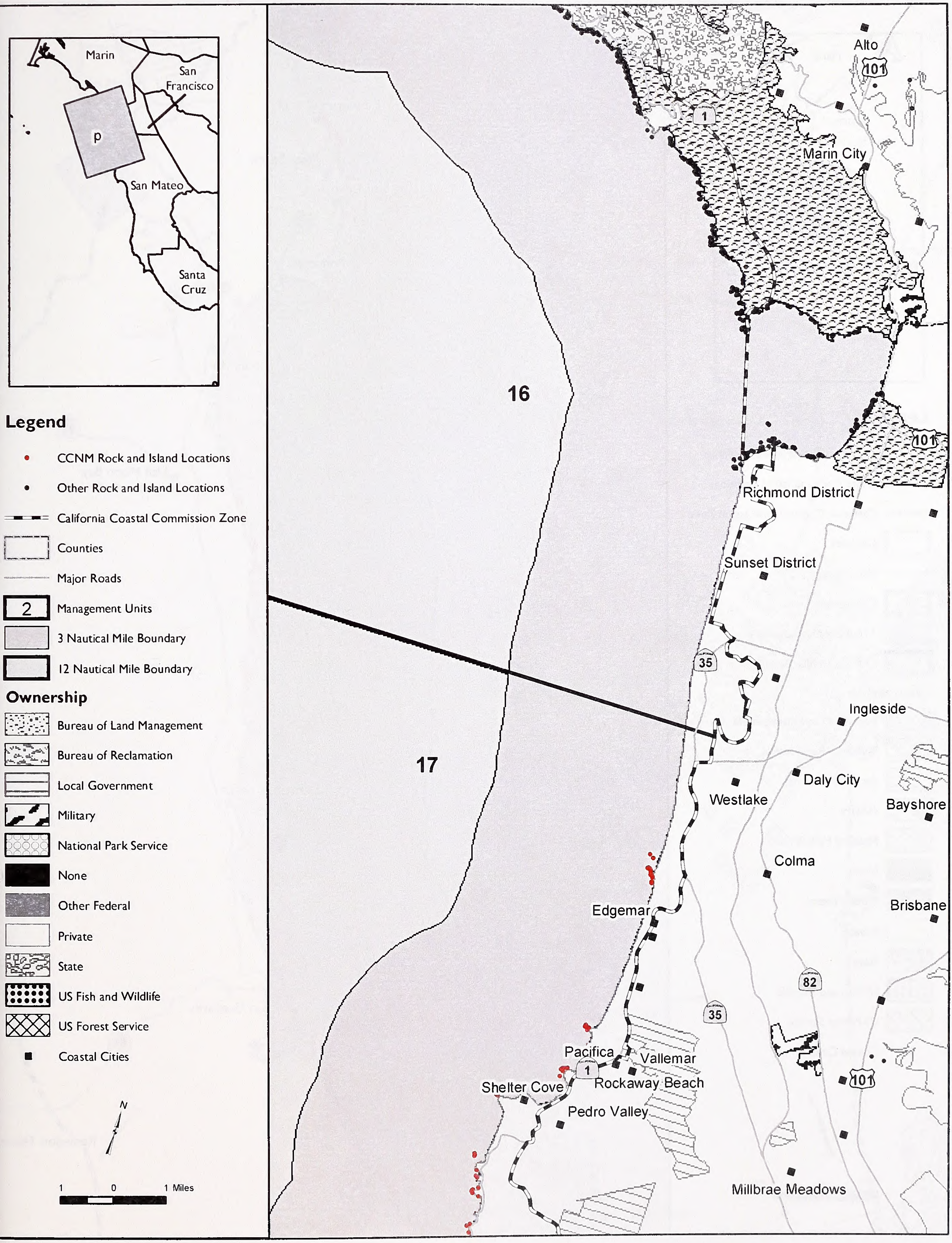
CCNM Sub-Units 13, 14, and 15


Sonoma
n
Marin
Legend
CCNM Rock and Island Locations
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1 0 1 Miles
15
16
1
1
1
Valley Ford
Dillon Beach
Tomales
Marshall
Marconi
Inverness
Inverness Park

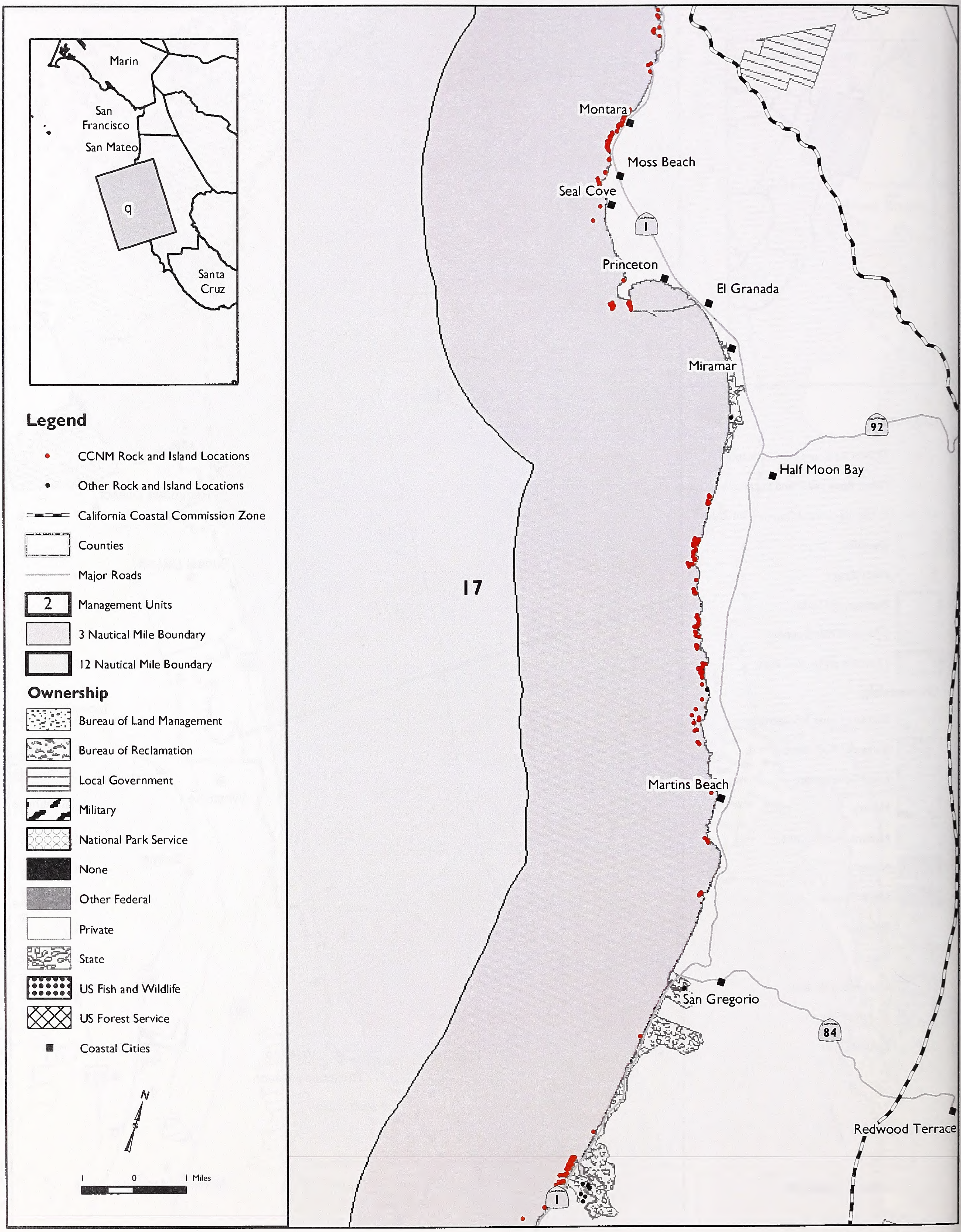
CCNM Sub-Units 15 and 16


Sonoma
Marin
Legend
CCNM Rock and Island Locations
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1
0
1 Miles
16
Invernes
Inverness Park
Point Reyes Station
Olema
Bolinas
1
Stinson Beach

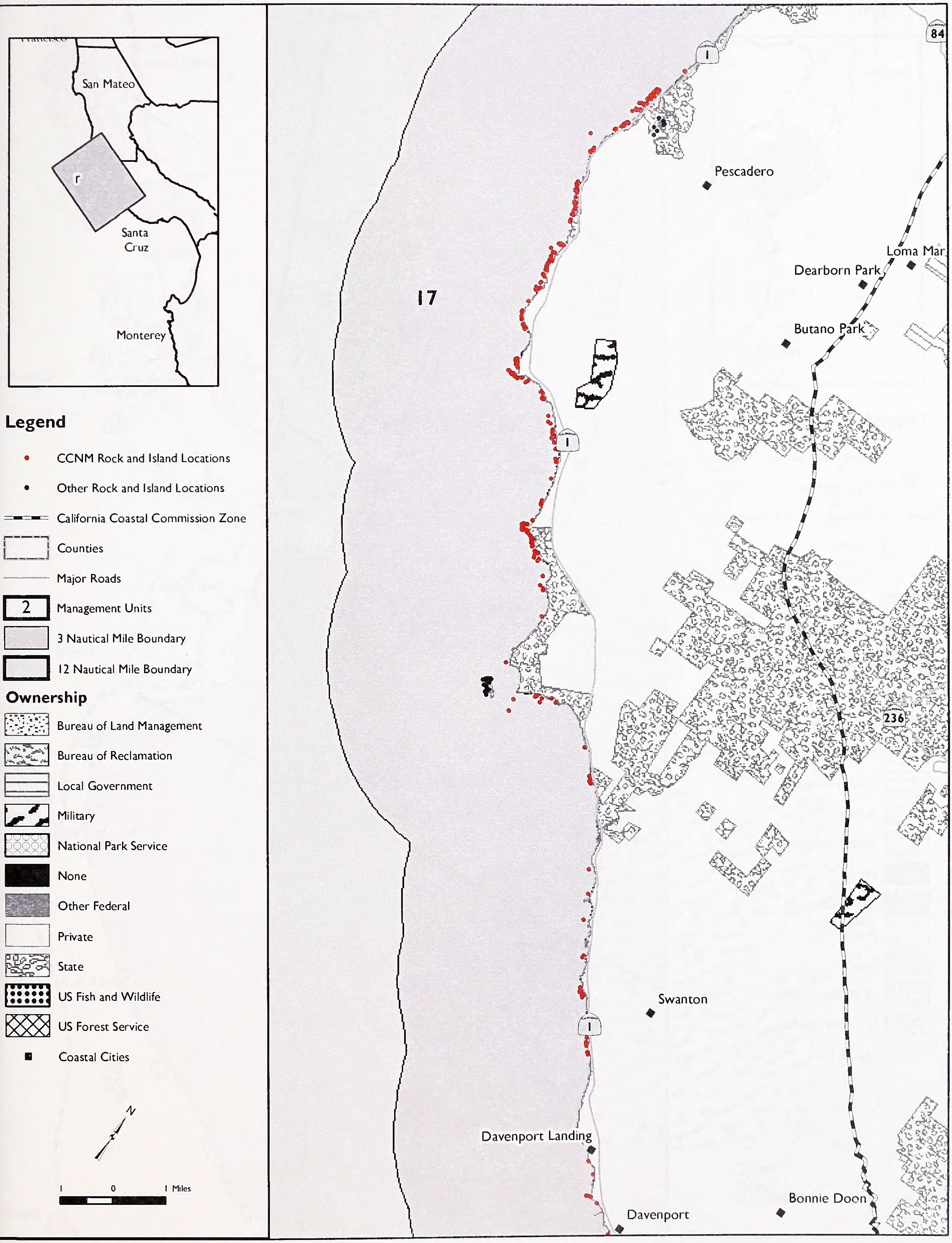
CCNM Sub-Unit 16


Marin
San Francisco
San Mateo
Santa Cruz
p
Legend
CCNM Rock and Island Locations
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1 0 1 Miles
16
17
Alto
101
1
Marin City
101
Richmond District
Sunset District
35
Ingleside
Daly City
Westlake
Bayshore
Colma
Brisbane
Edgemar
82
35
Pacifica
Vallemar
Shelter Cove
Rockaway Beach
101
Pedro Valley
Millbrae Meadows

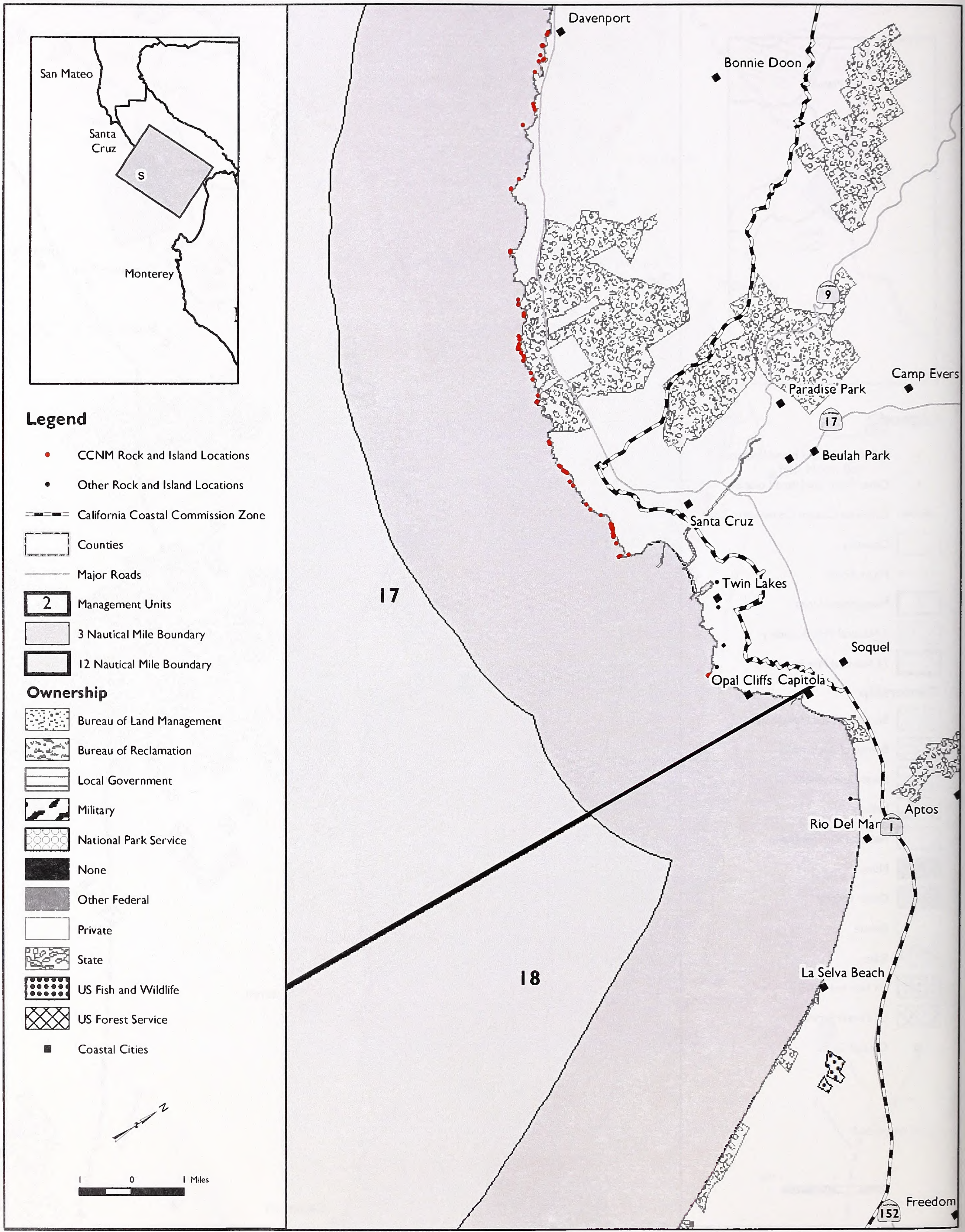
CCNM Sub-Units 16 and 17


Marin
San Francisco
San Mateo
9
Santa Cruz
Legend
CCNM Rock and Island Locations
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1 0 1 Miles
Montara
Moss Beach
Seal Cove
1
Princeton
El Granada
Miramar
92
Half Moon Bay
17
Martins Beach
San Gregorio
84
Redwood Terrace
1

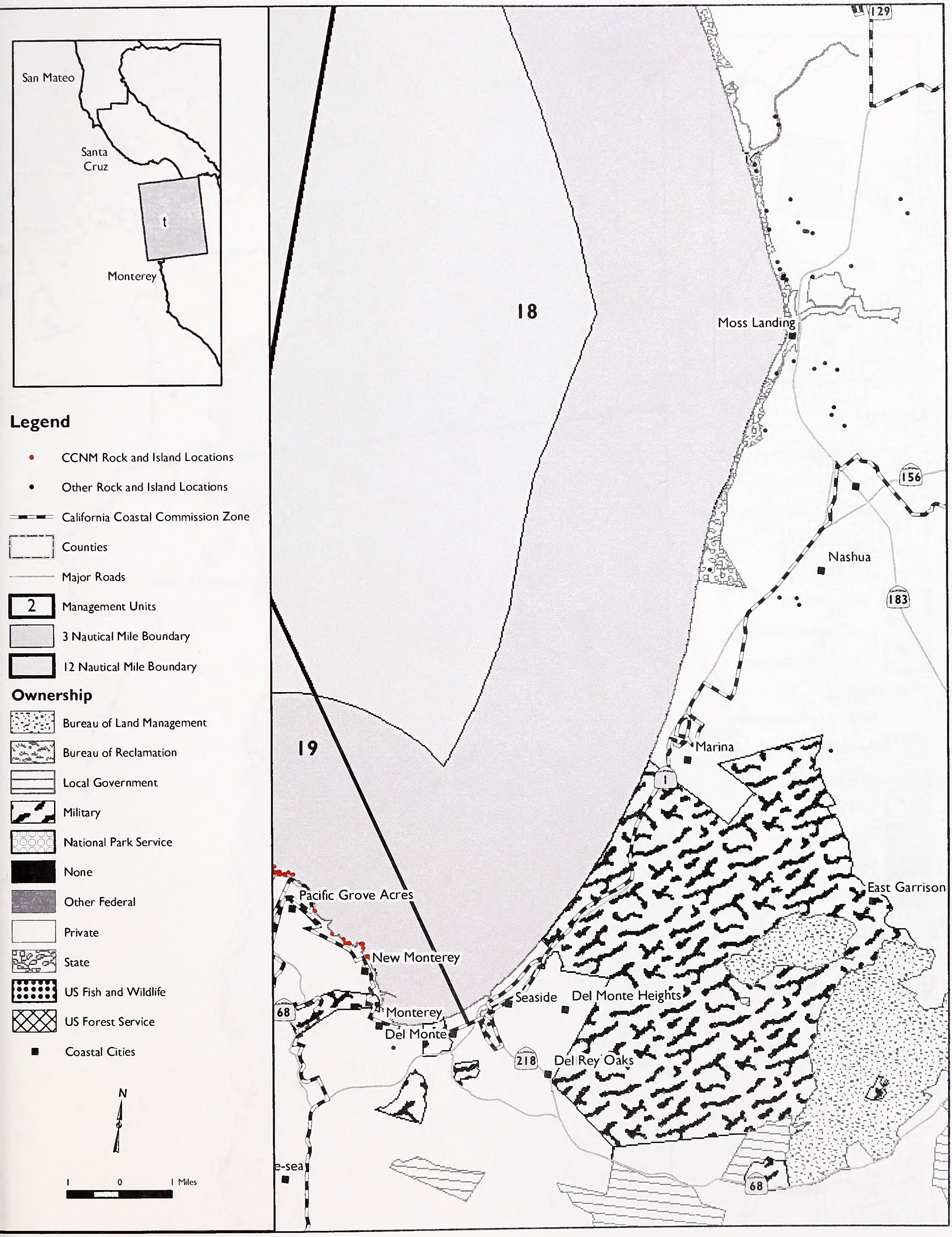
CCNM Sub-Unit 17


San Mateo
r
Santa Cruz
Monterey
Legend
CCNM Rock and Island Locations
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1 0 1 Miles
84
1
Pescadero
Loma Mar
Dearborn Park
Butano Park
17
1
236
Swanton
1
Davenport Landing
Davenport
Bonnie Doon

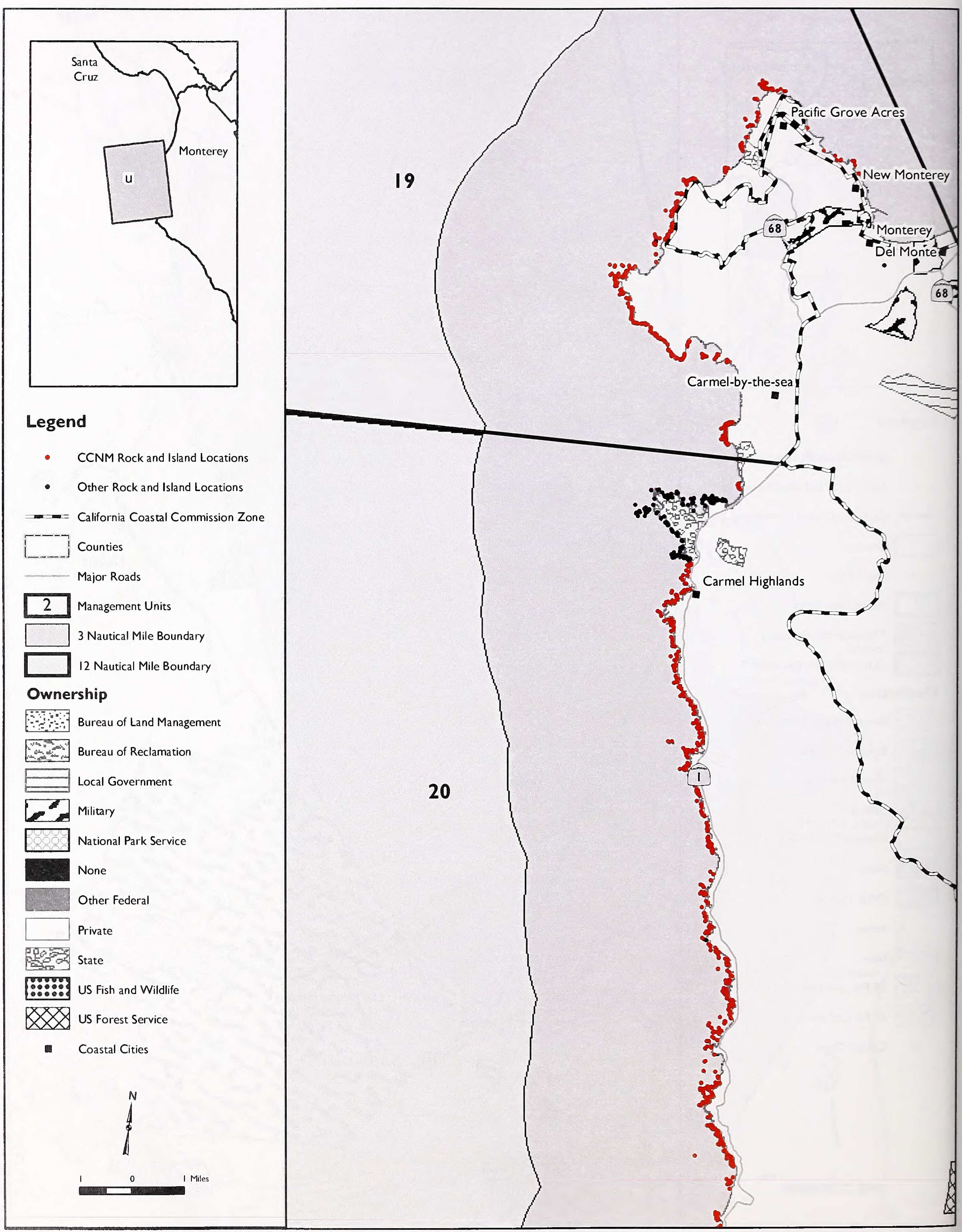
CCNM Sub-Unit 17


San Mateo
Santa Cruz
S
Monterey
Legend
CCNM Rock and Island Locations
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1 0 1 Miles
Davenport
Bonnie Doon
9
Camp Evers
Paradise Park
17
Beulah Park
Santa Cruz
Twin Lakes
Soquel
Opal Cliffs
Capitola
Aptos
Rio Del Mar
1
La Selva Beach
Freedom
152
17
18

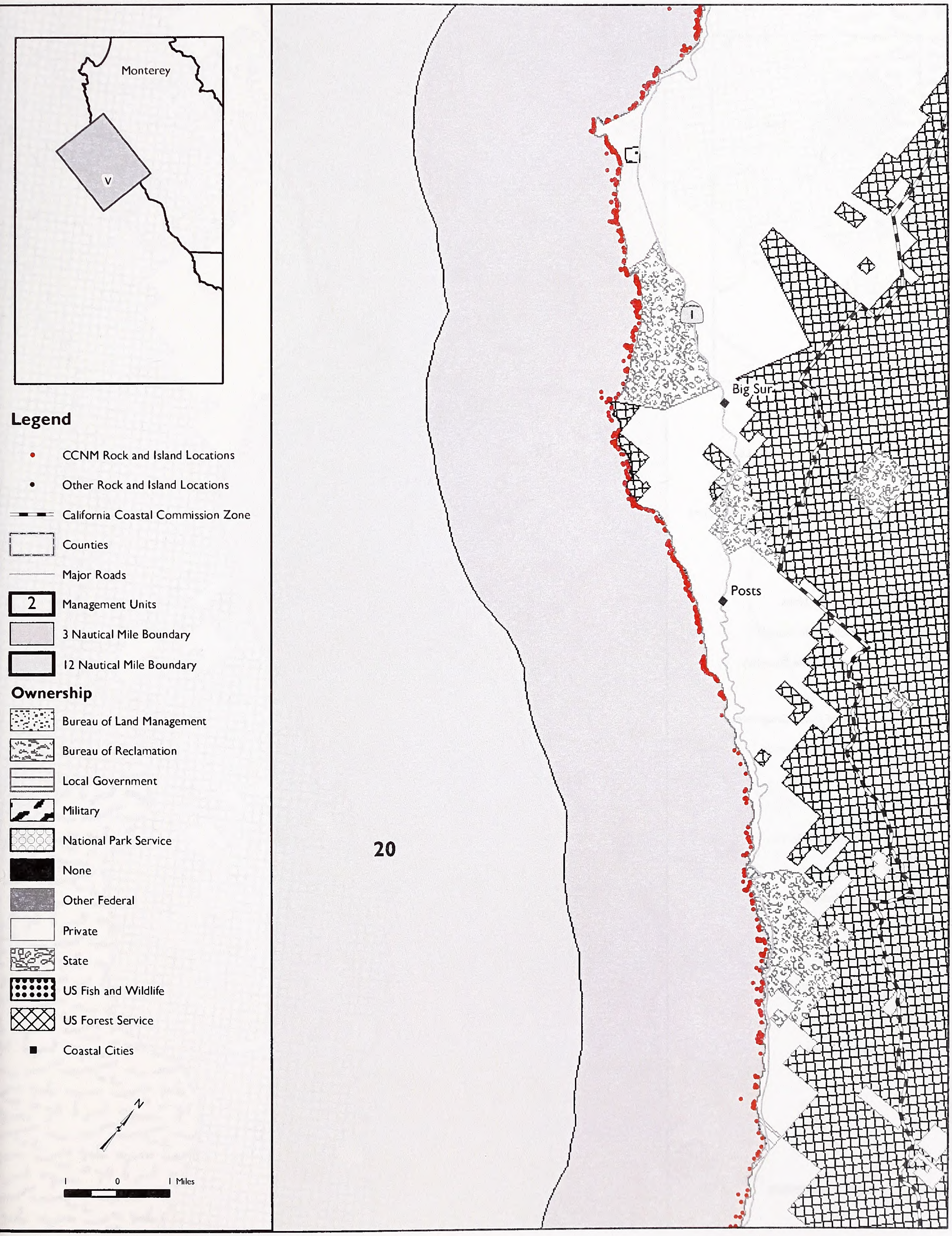
CCNM Sub-Units 17 and 18


San Mateo
Santa Cruz
Monterey
t
Legend
CCNM Rock and Island Locations
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1
0
1 Miles
129
18
19
Moss Landing
156
Nashua
183
Marina
1
East Garrison
Pacific Grove Acres
New Monterey
Seaside
Del Monte Heights
68
Monterey
Del Monte
218
Del Rey Oaks
e-sea
68

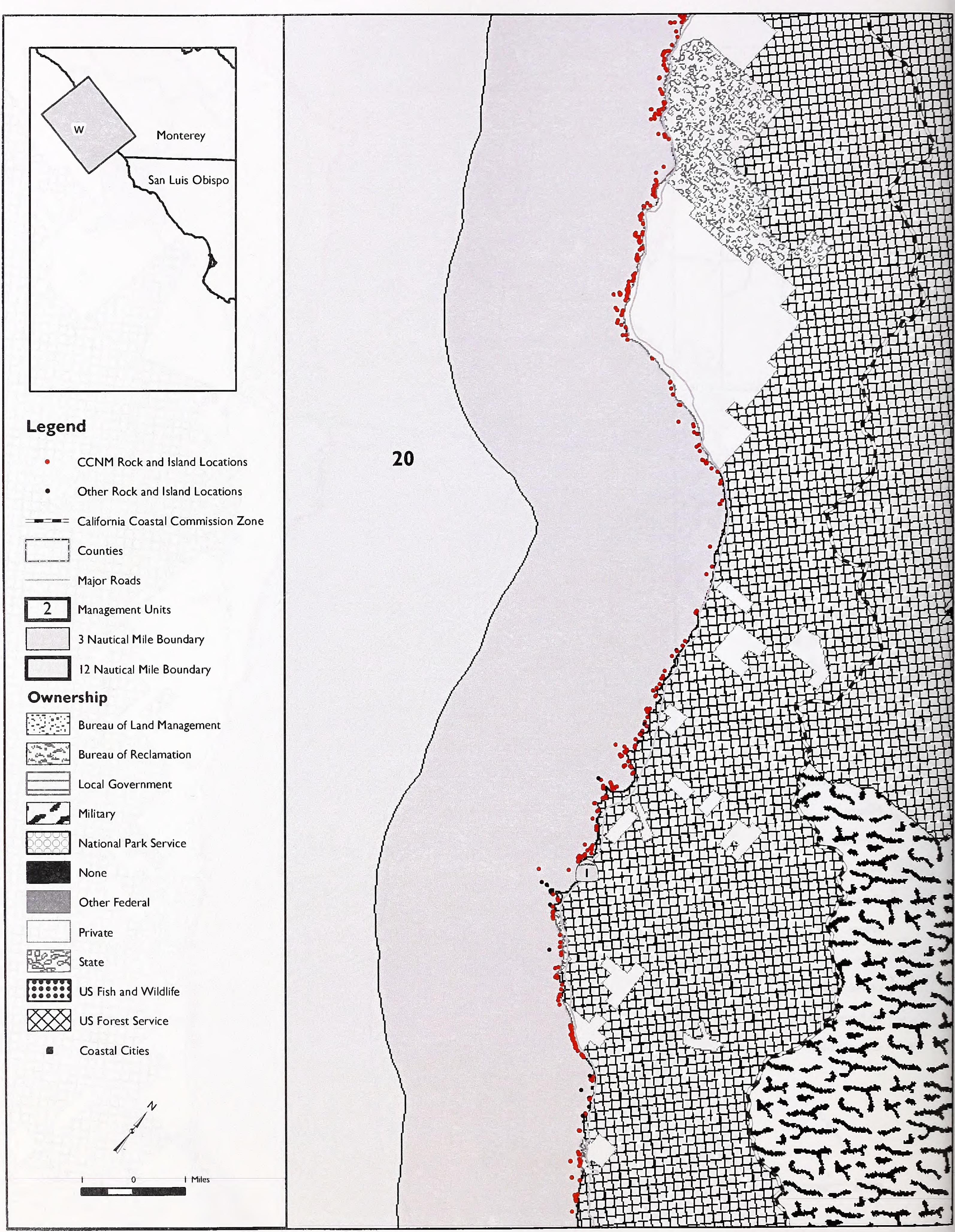
CCNM Sub-Unit 18


Santa Cruz
Monterey
u
Legend
CCNM Rock and Island Locations
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1 0 1 Miles
19
20
Pacific Grove Acres
New Monterey
Monterey
Del Monte
68
68
Carmel-by-the-sea
Carmel Highlands
1

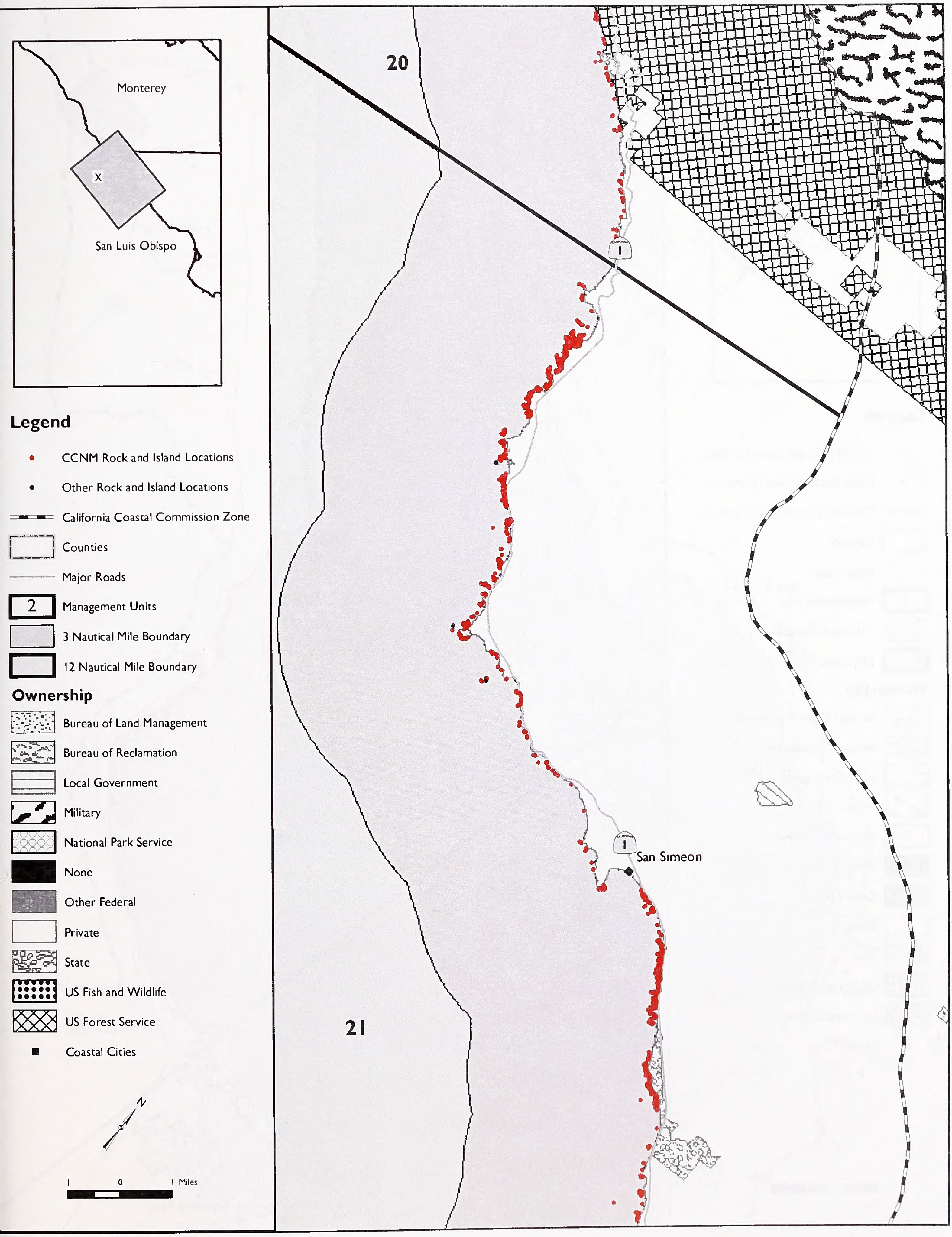
CCNM Sub-Units 19 and 20


Monterey
V
Legend
CCNM Rock and Island Locations
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1 0 1 Miles
1
Big Sur
Posts
20

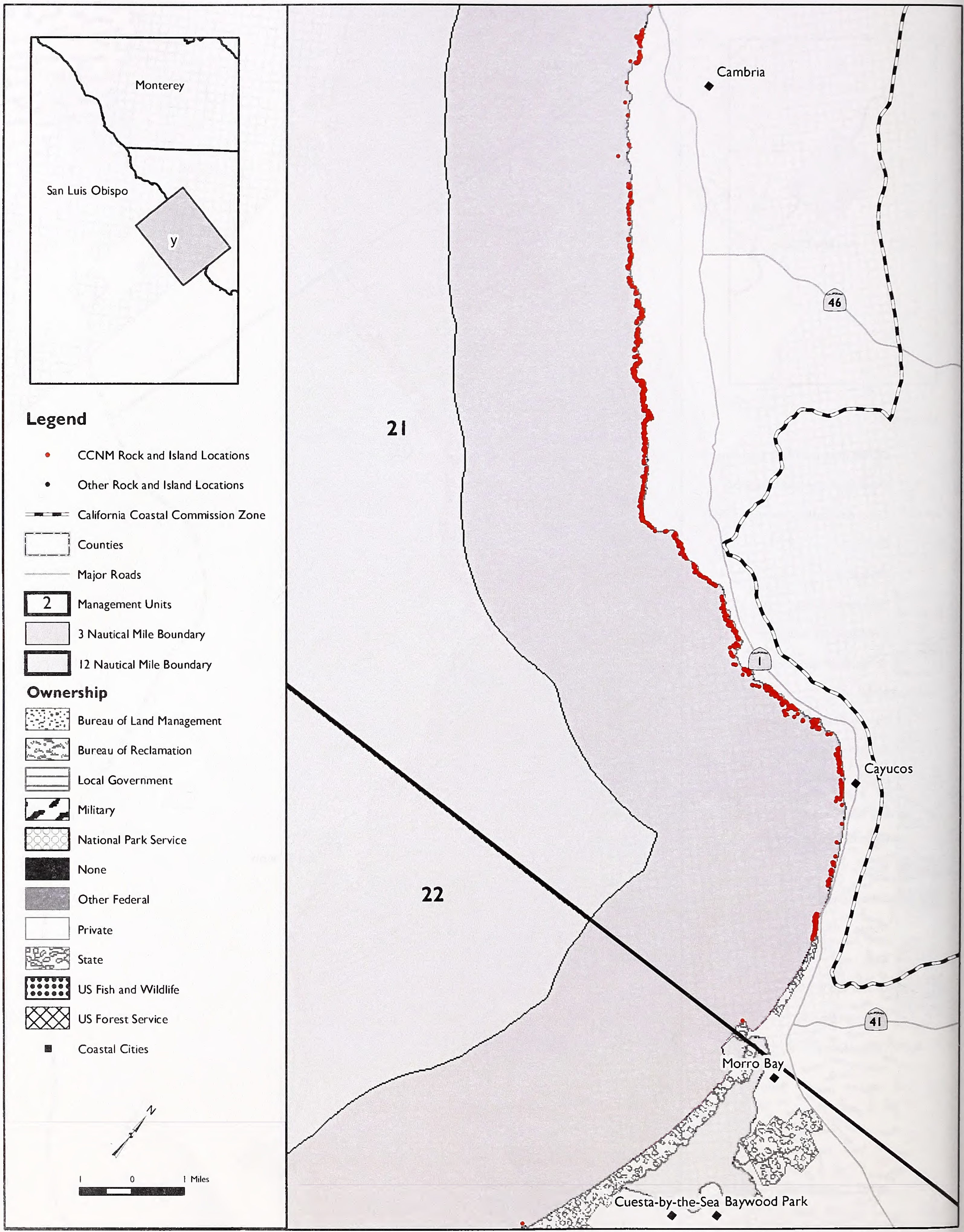
CCNM Sub-Unit 20


W
Monterey
San Luis Obispo
Legend
CCNM Rock and Island Locations
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1
0
1 Miles
20
1

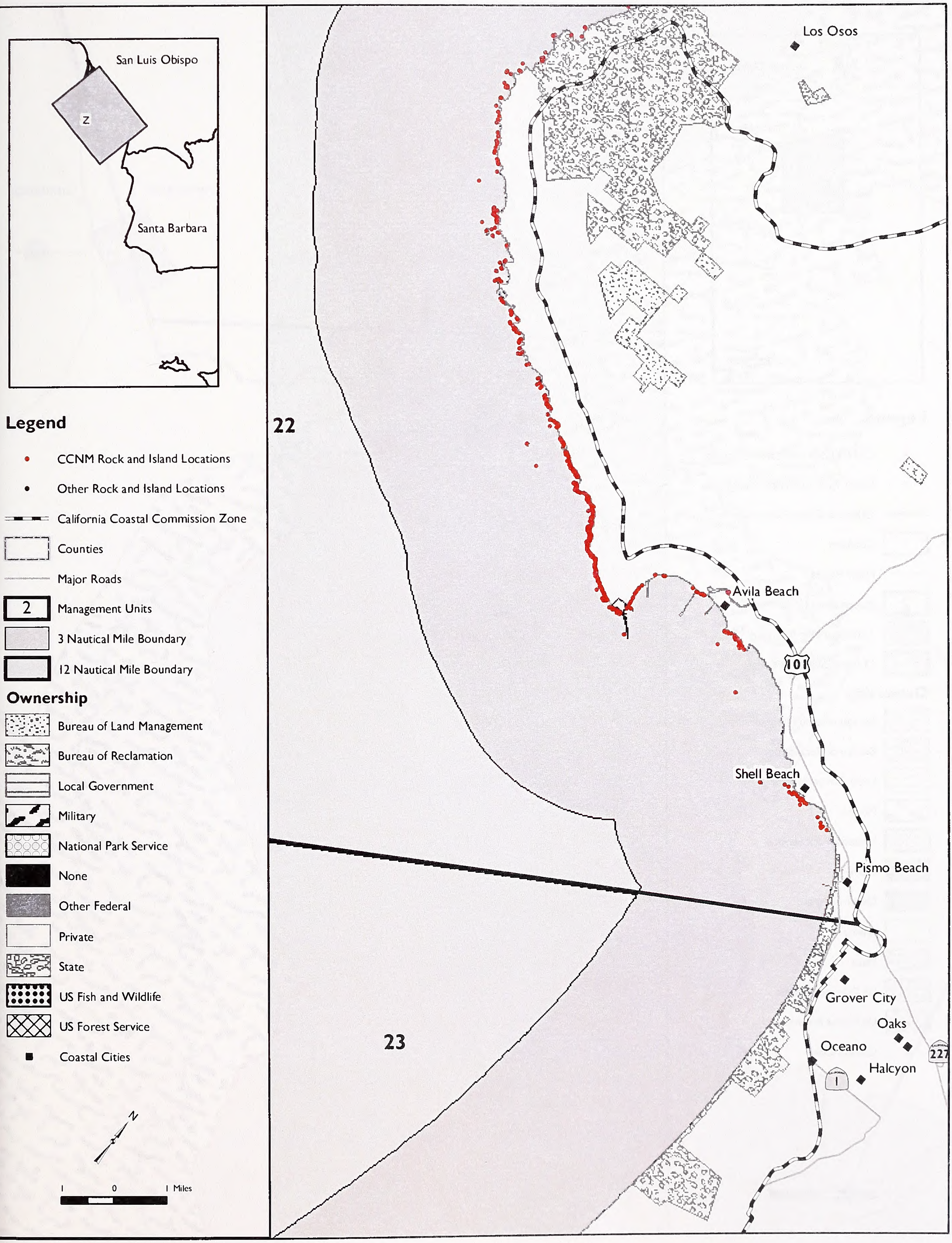
CCNM Sub-Unit 20


Monterey
X
San Luis Obispo
Legend
CCNM Rock and Island Locations
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1 0 1 Miles
20
21
1
1
San Simeon

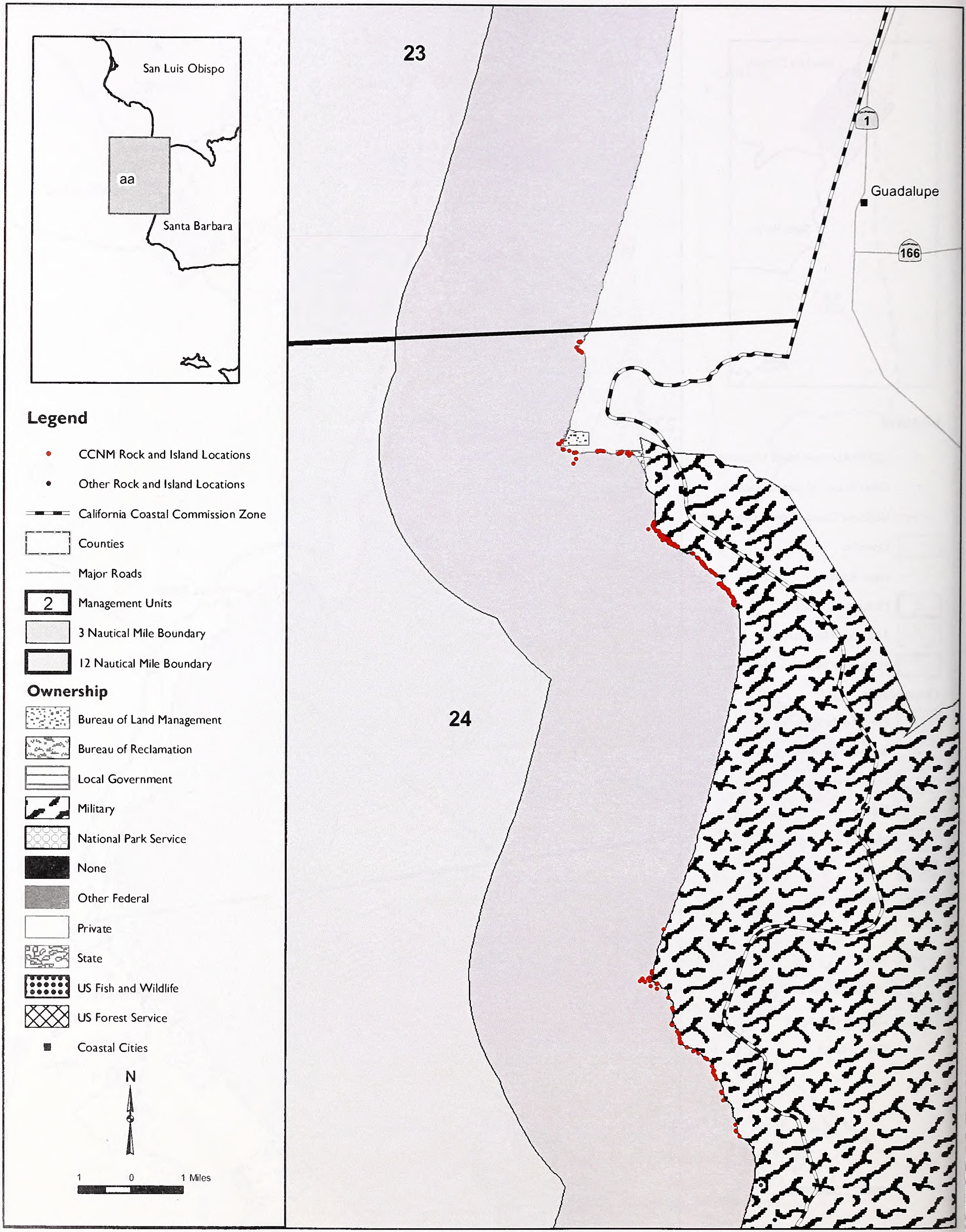
CCNM Sub-Unit 21


Monterey
San Luis Obispo
y
Legend
CCNM Rock and Island Locations
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1 0 1 Miles
Cambria
46
21
1
Cayucos
22
41
Morro Bay
Cuesta-by-the-Sea
Baywood Park

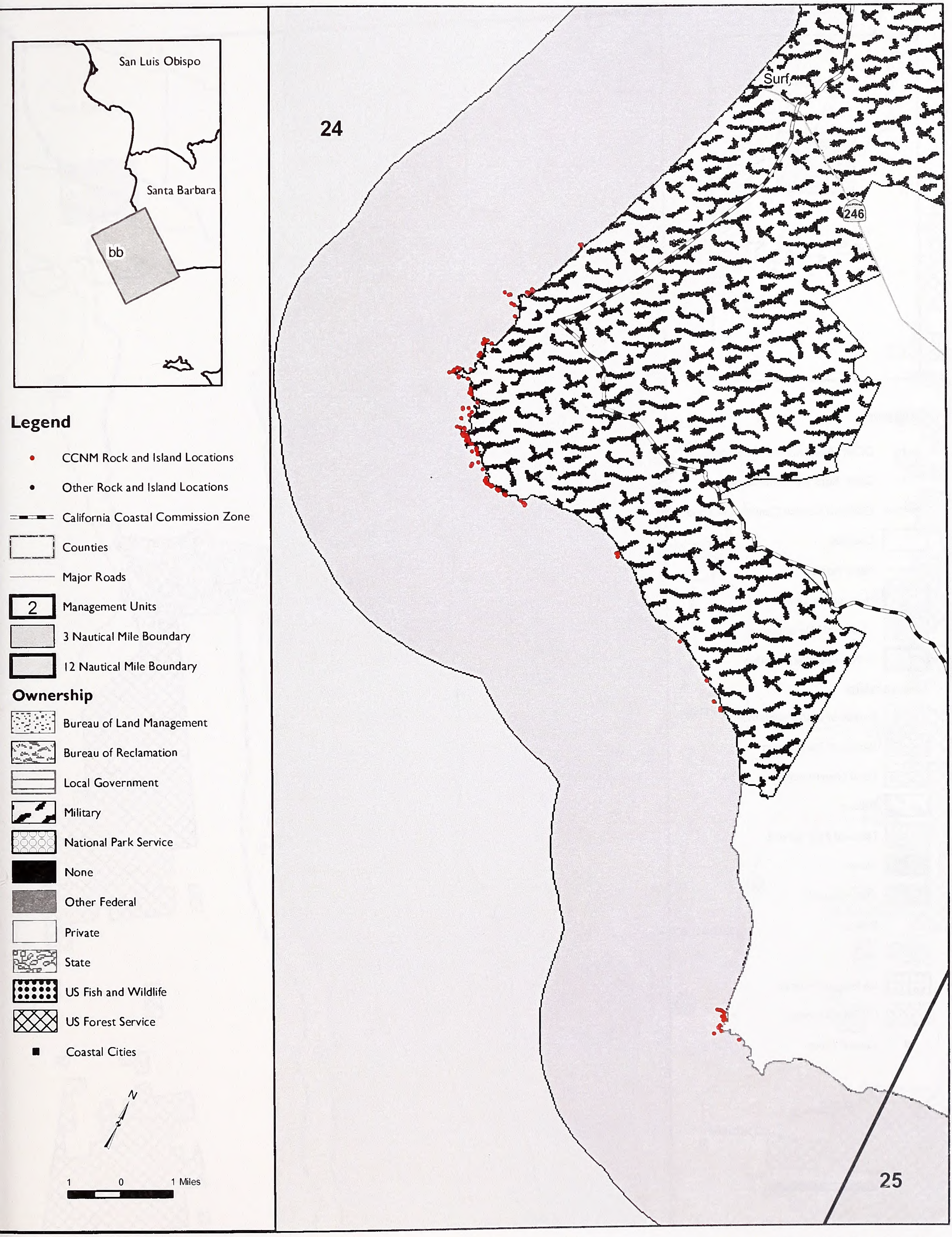
CCNM Sub-Units 21 and 22


San Luis Obispo
Z
Santa Barbara
Legend
CCNM Rock and Island Locations
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1 0 1 Miles
22
23
Los Osos
Avila Beach
101
Shell Beach
Pismo Beach
Grover City
Oaks
Oceano
Halcyon
227
1

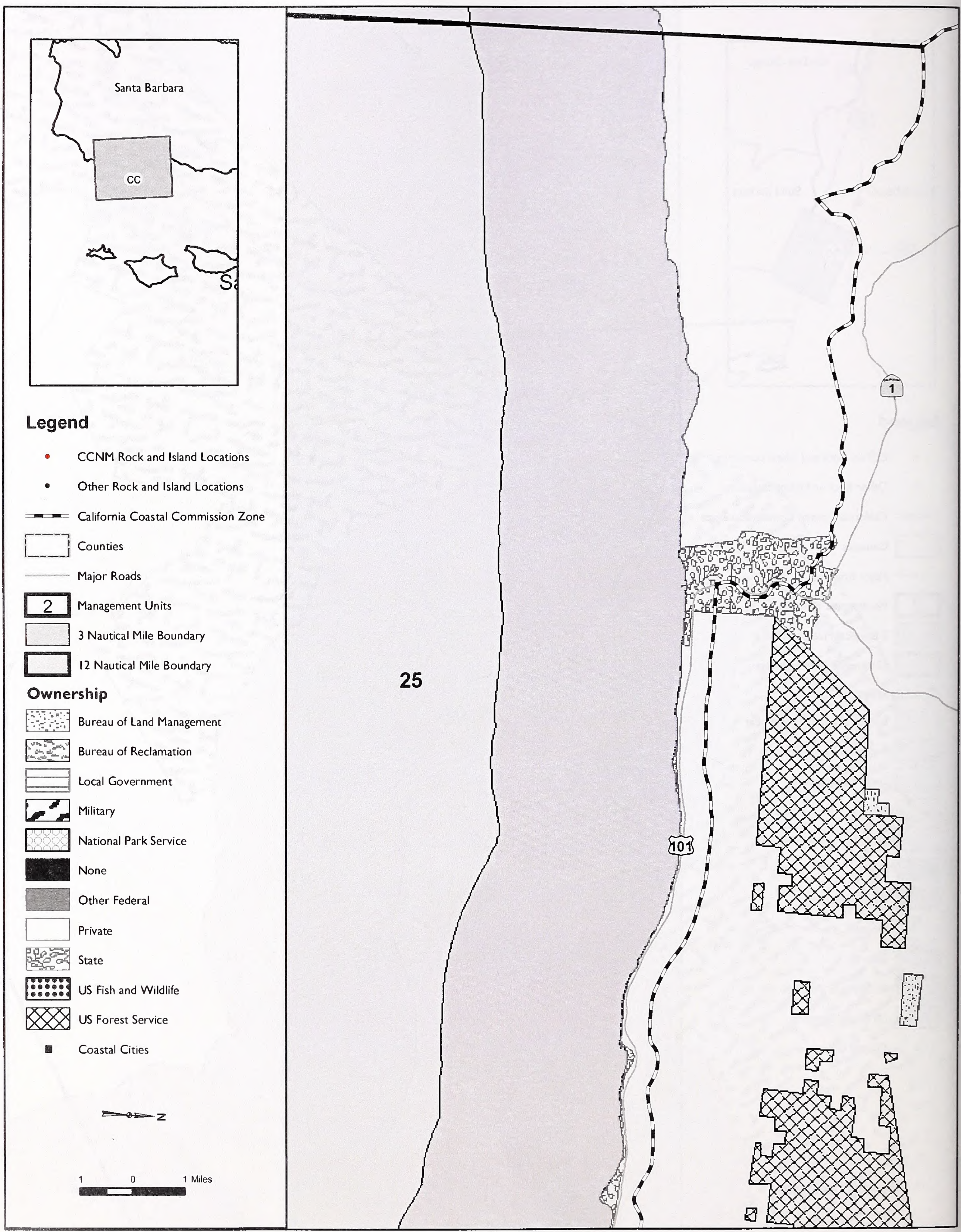
CCNM Sub-Units 22 and 23


San Luis Obispo
aa
Santa Barbara
Legend
CCNM Rock and Island Locations
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1
0
1 Miles
23
24
1
Guadalupe
166

CCNM Sub-Units 23 and 24


San Luis Obispo
Santa Barbara
bb
Legend
CCNM Rock and Island Locations
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1
0
1 Miles
24
Surf
246
25

CCNM Sub-Unit 24


Santa Barbara
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Legend
CCNM Rock and Island Locations
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
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1 Miles
25
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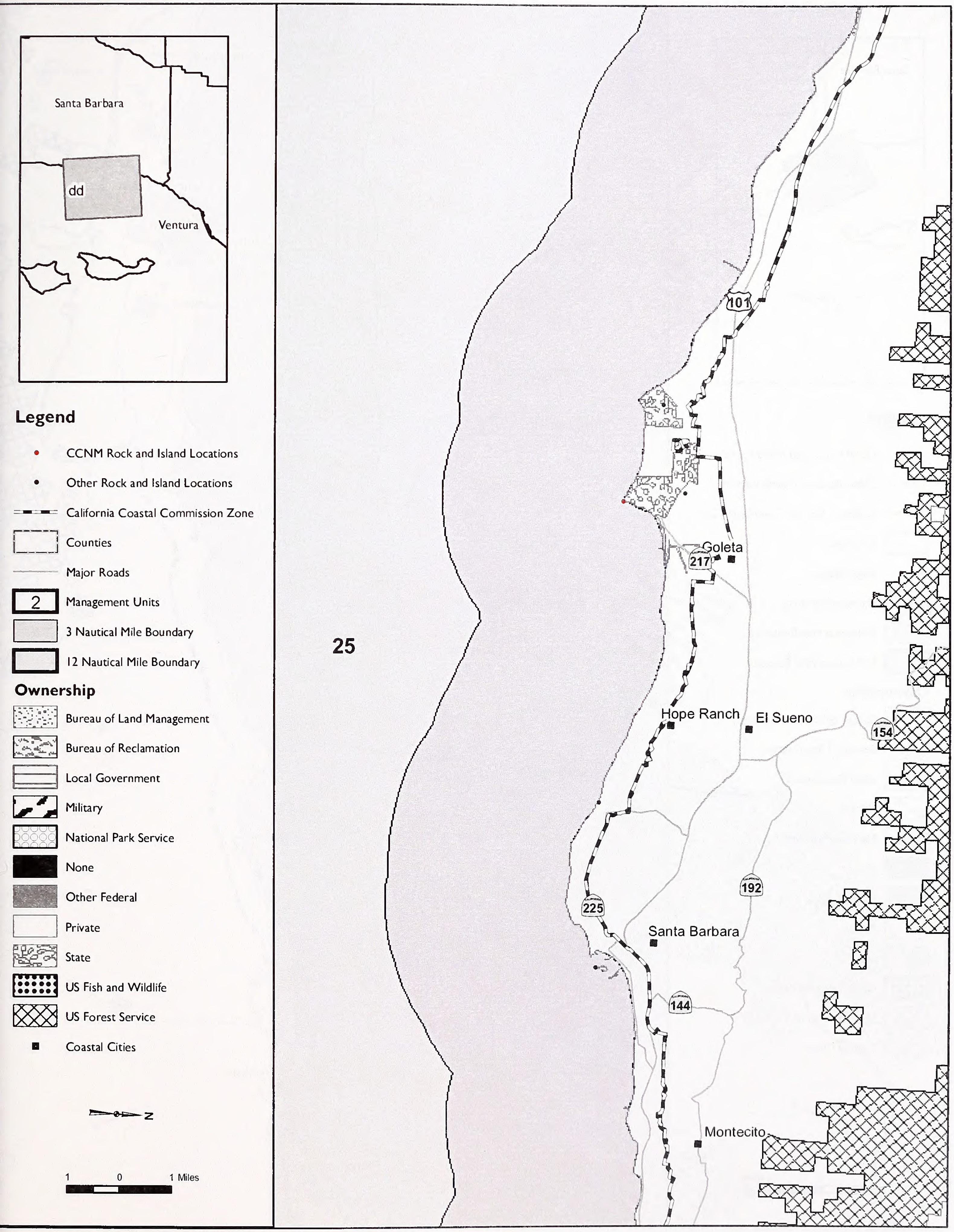
101

CCNM Sub-Unit 25


Santa Barbara
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Other Rock and Island Locations
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Counties
Major Roads
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Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
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1 Miles
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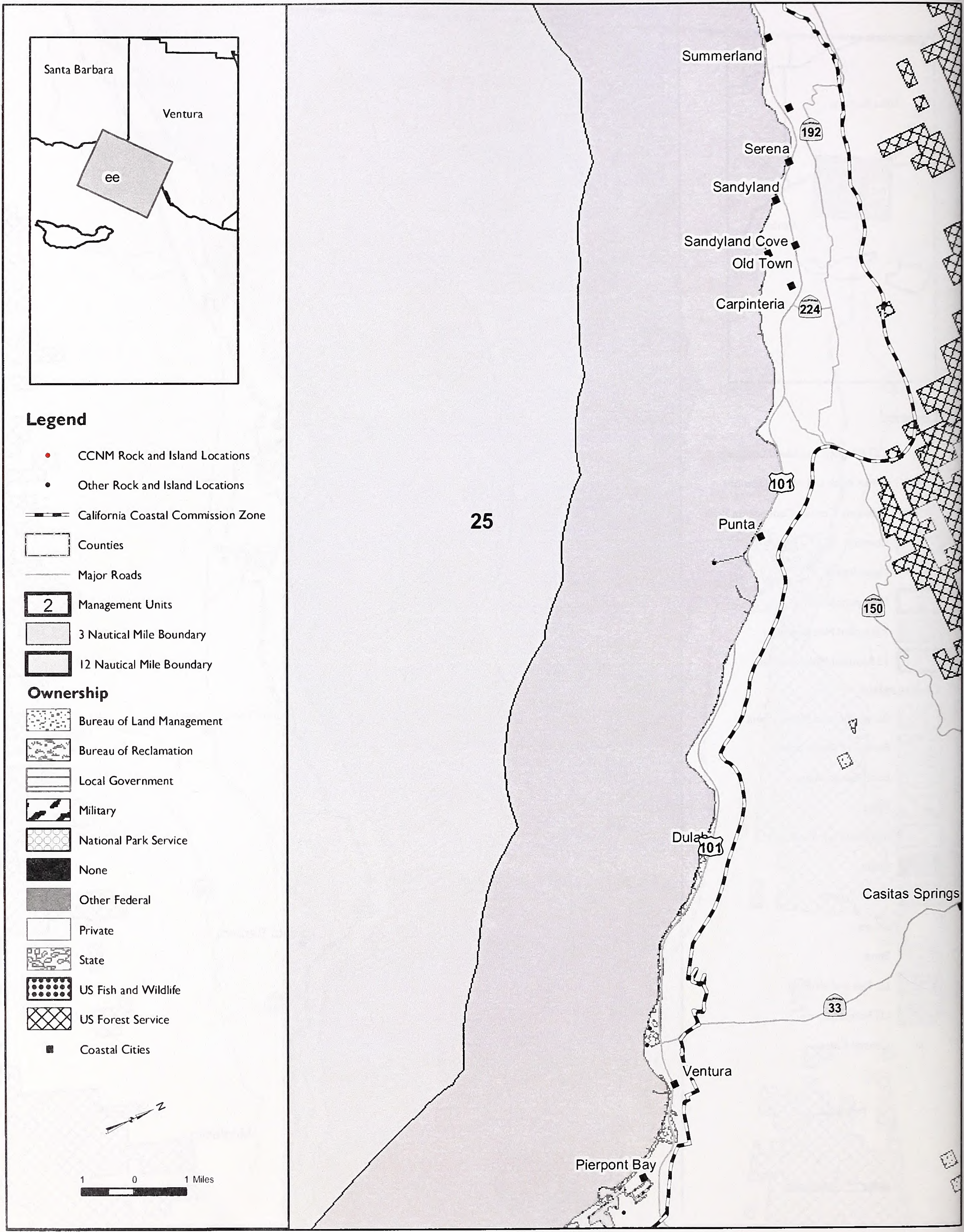
Goleta
217
Hope Ranch
El Sueno
154
192
225
Santa Barbara
144
Montecito

CCNM Sub-Unit 25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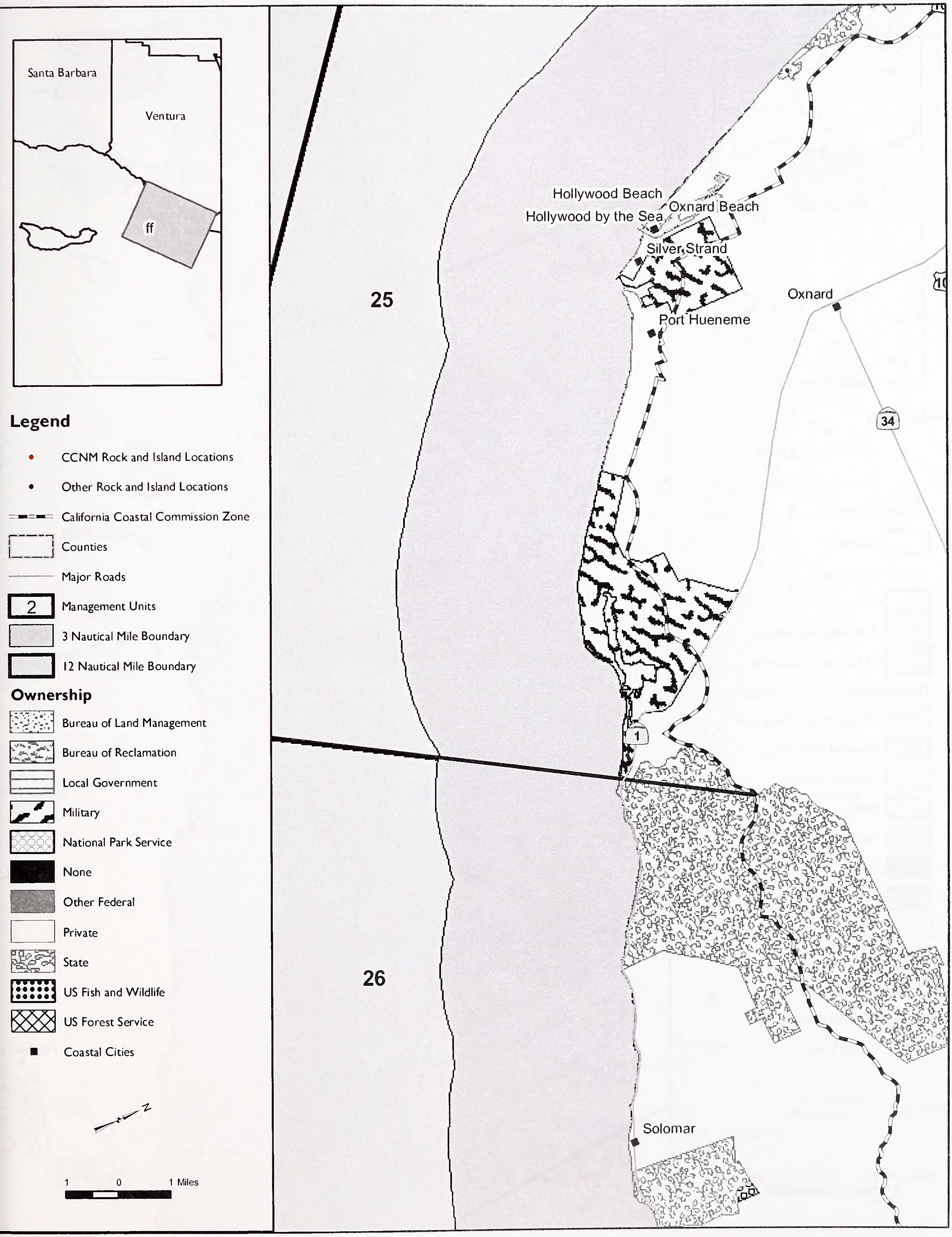
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1
0
1 Miles
25
Summerland
192
Serena
Sandyland
Sandyland Cove
Old Town
Carpinteria
224
101
Punta
150
Dulah
101
Casitas Springs
33
Ventura
Pierpont Bay

CCNM Sub-Unit 25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Other Rock and Island Locations
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Major Roads
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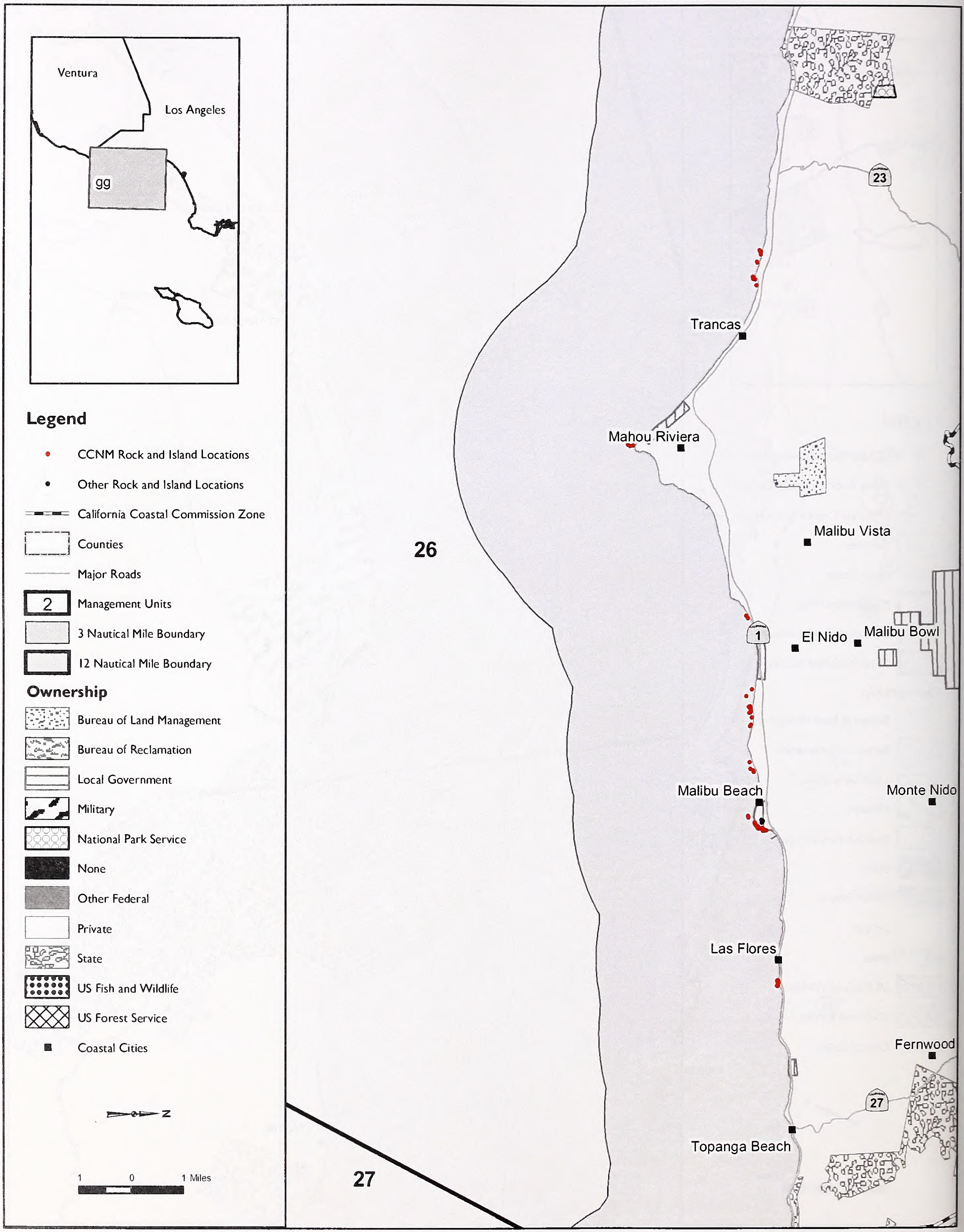
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1
0
1 Miles
25
26
Hollywood Beach
Hollywood by the Sea
Oxnard Beach
Silver Strand
Oxnard
Port Hueneme
34
1
Solomar

CCNM Sub-Units 25 and 26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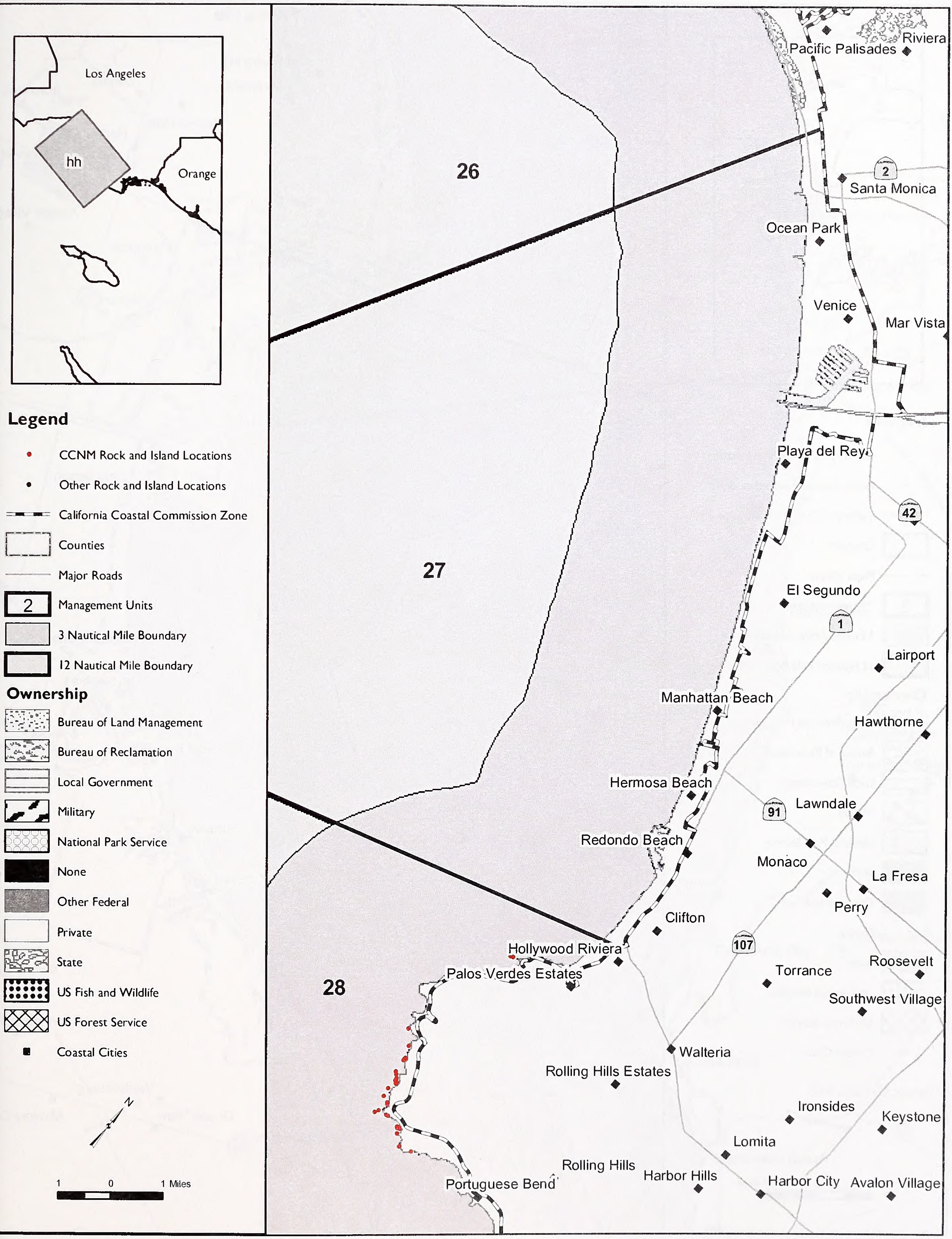
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1
0
1 Miles
23
Trancas
Mahou Riviera
Malibu Vista
26
1
El Nido
Malibu Bowl
Malibu Beach
Monte Nido
Las Flores
Fernwood
27
Topanga Beach
27

CCNM Sub-Unit 26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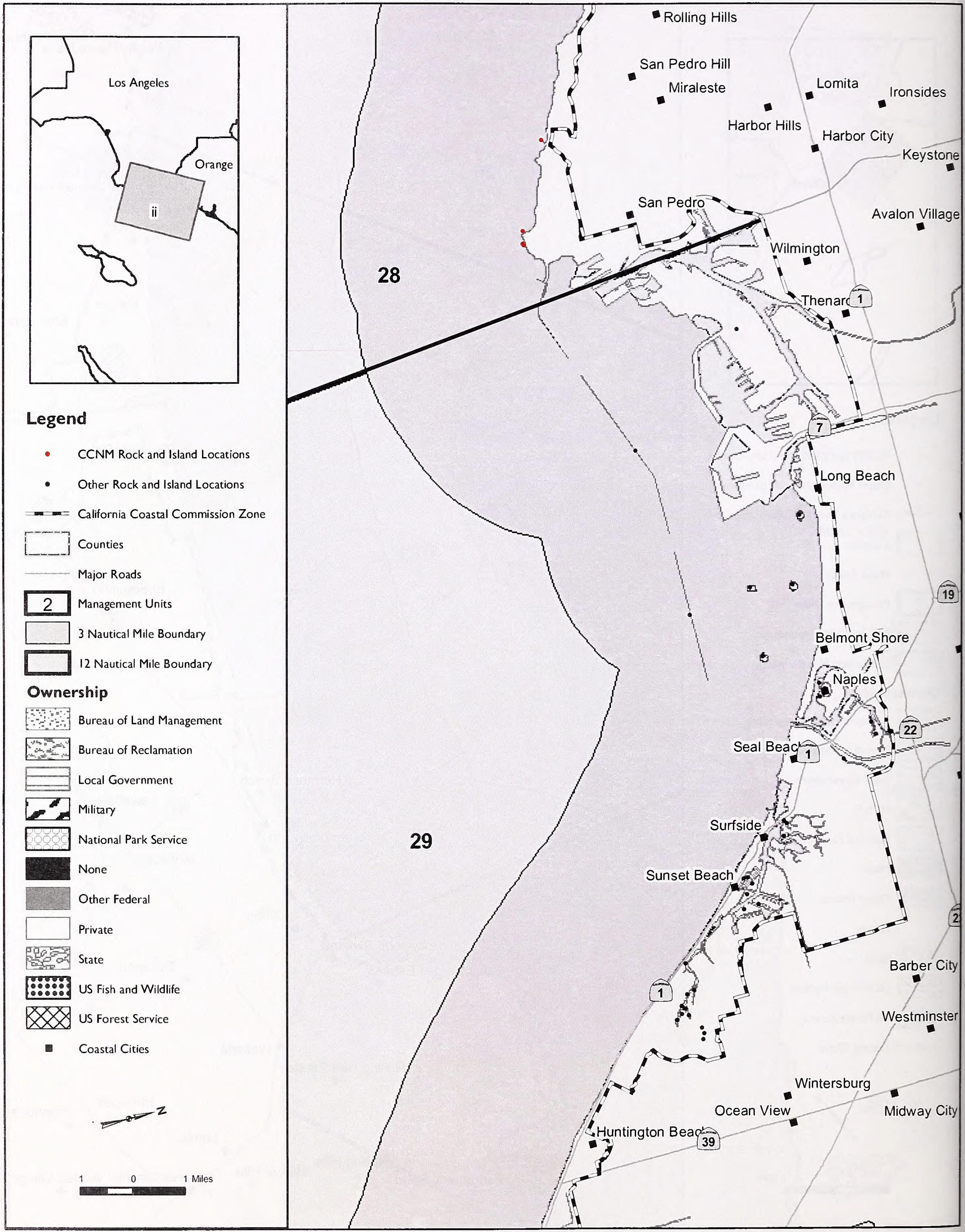
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1
0
1 Miles
26
27
28
Riviera
Pacific Palisades
2
Santa Monica
Ocean Park
Venice
Mar Vista
Playa del Rey
42
El Segundo
1
Lairport
Manhattan Beach
Hawthorne
Hermosa Beach
91
Lawndale
Redondo Beach
Monaco
La Fresa
Perry
Clifton
107
Hollywood Riviera
Palos Verdes Estates
Torrance
Roosevelt
Southwest Village
Walteria
Rolling Hills Estates
Ironsides
Keystone
Lomita
Rolling Hills
Harbor Hills
Harbor City
Avalon Village
Portuguese Bend

CCNM Sub-Units 26 and 27


Los Angeles
Orange
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Legend
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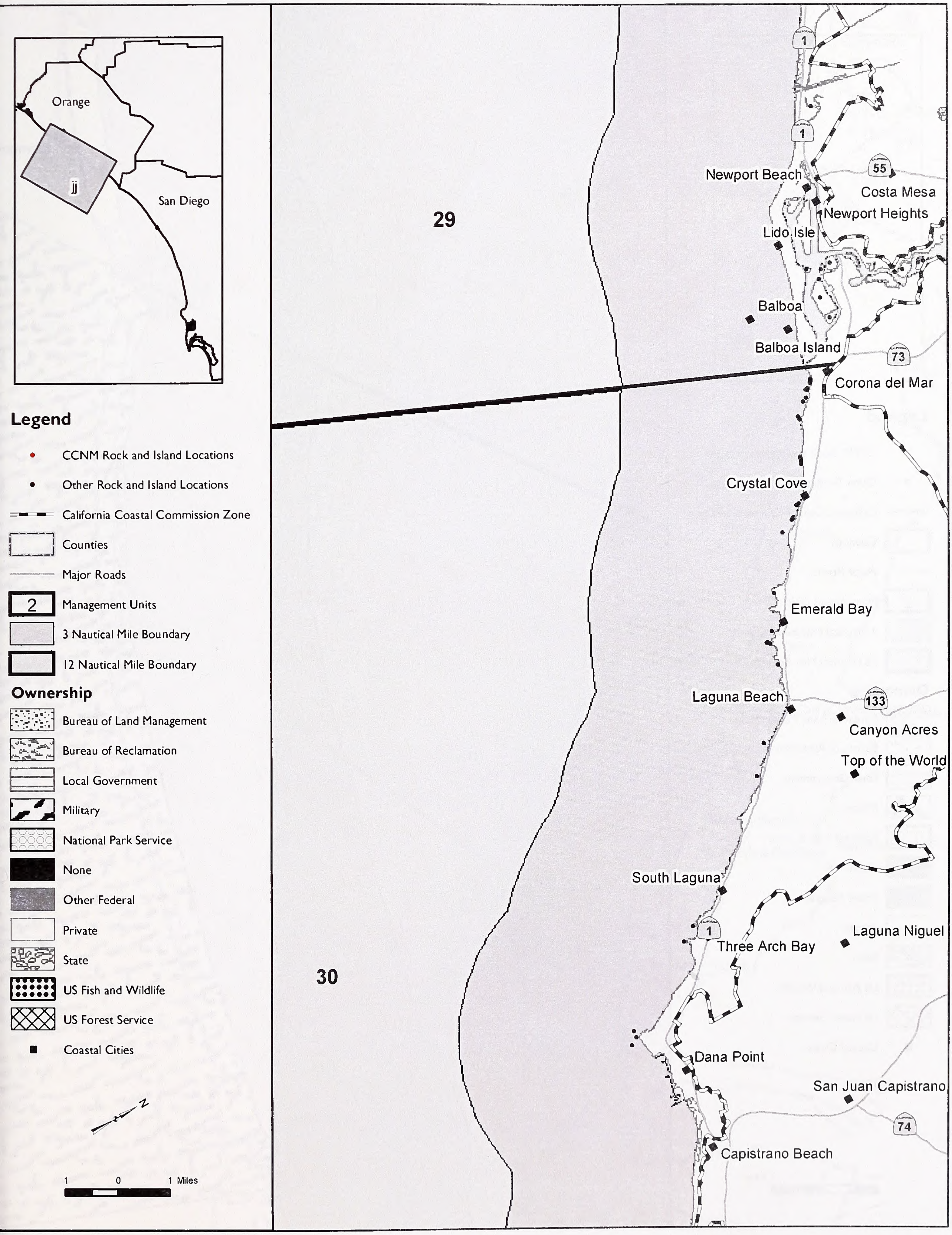
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1
0
1 Miles
28
29
Rolling Hills
San Pedro Hill
Miraleste
Lomita
Ironsides
Harbor Hills
Harbor City
Keystone
San Pedro
Avalon Village
Wilmington
Thenard
1
7
Long Beach
19
Belmont Shore
Naples
22
Seal Beach
1
Surfside
Sunset Beach
Barber City
1
Westminster
Wintersburg
Ocean View
Midway City
Huntington Beach
39

CCNM Sub-Units 28 and 29


Orange
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San Diego
Legend
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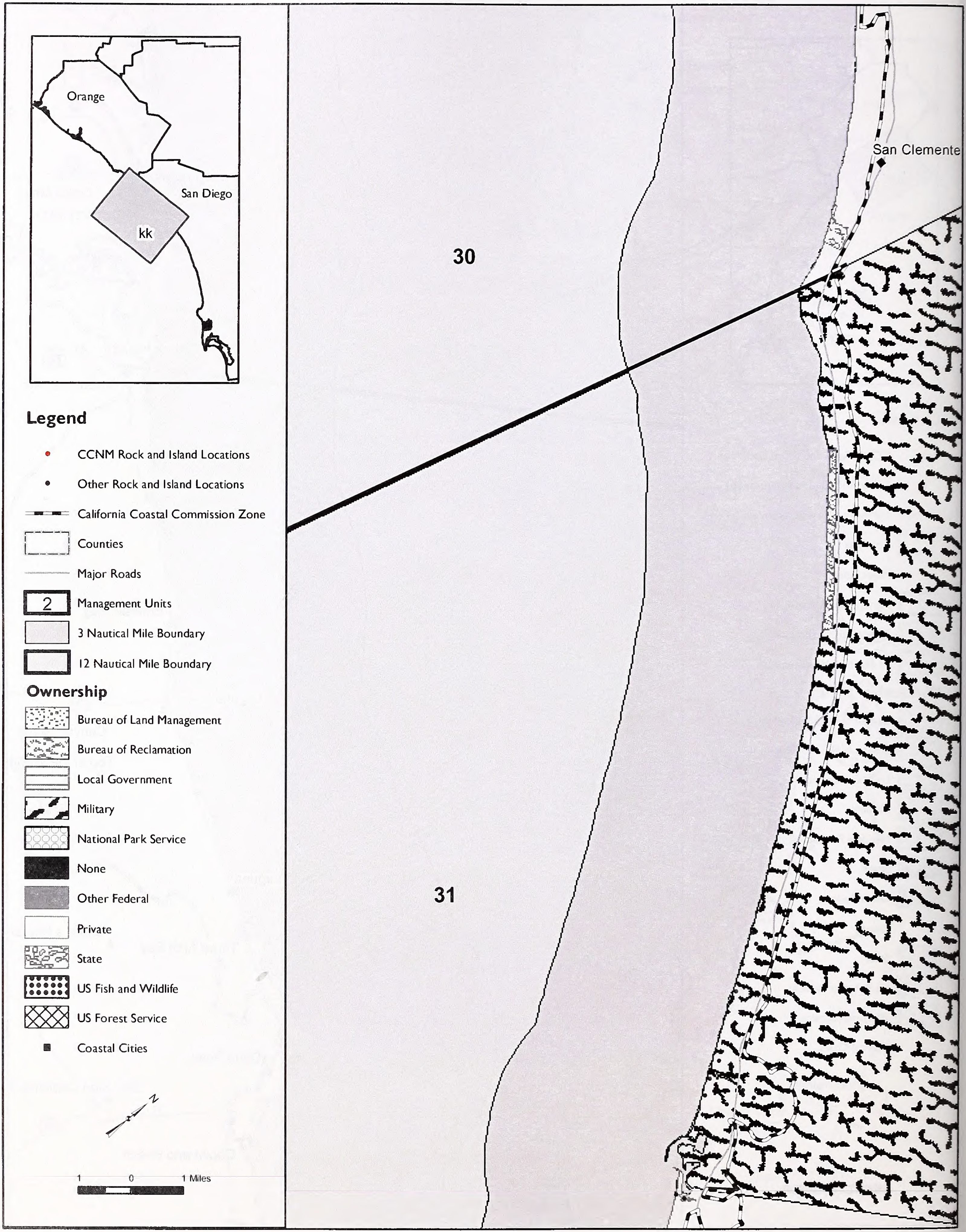
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1 0 1 Miles
29
30
1
1
55
73
133
1
74
Newport Beach
Costa Mesa
Newport Heights
Lido Isle
Balboa
Balboa Island
Corona del Mar
Crystal Cove
Emerald Bay
Laguna Beach
Canyon Acres
Top of the World
South Laguna
Three Arch Bay
Laguna Niguel
Dana Point
San Juan Capistrano
Capistrano Beach

CCNM Sub-Units 29 and 30


Orange
San Diego
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Legend
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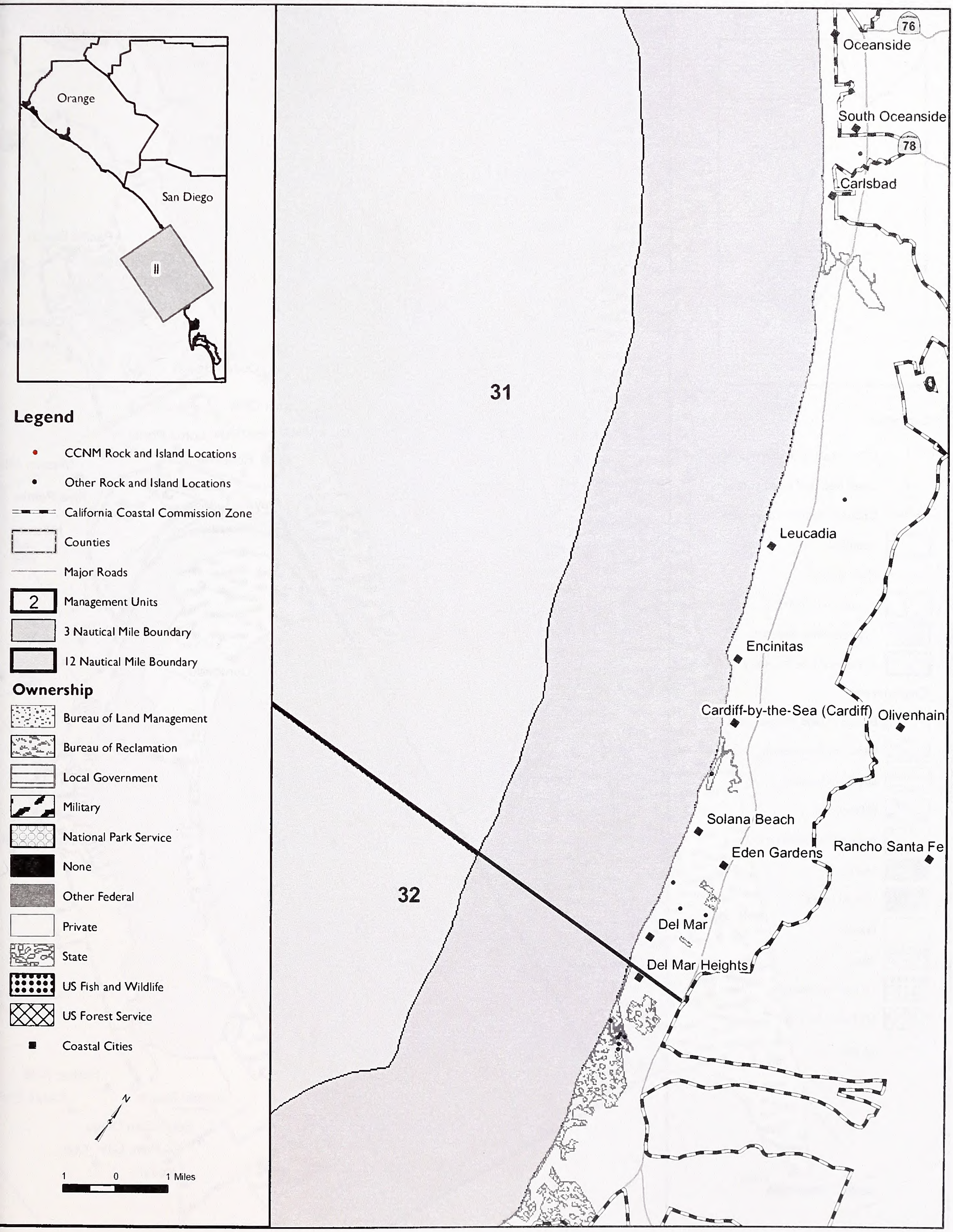
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1
0
1 Miles
30
31
San Clemente

CCNM Sub-Units 30 and 31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San Diego
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Legend
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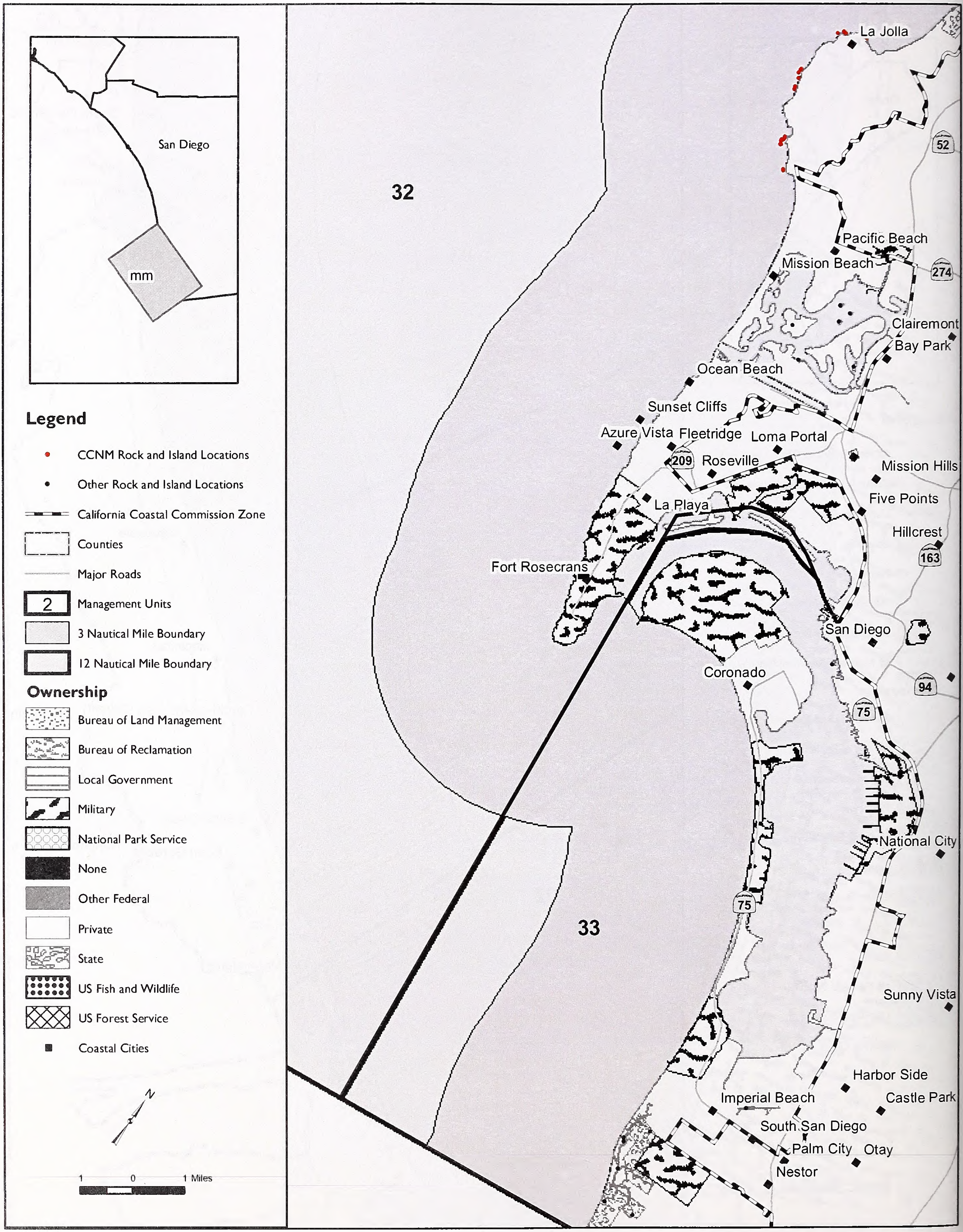
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1
0
1 Miles
76
Oceanside
South Oceanside
78
Carlsbad
31
Leucadia
Encinitas
Cardiff-by-the-Sea (Cardiff)
Olivenhain
Solana Beach
Eden Gardens
Rancho Santa Fe
32
Del Mar
Del Mar Heights

CCNM Sub-Units 31 and 32


San Diego
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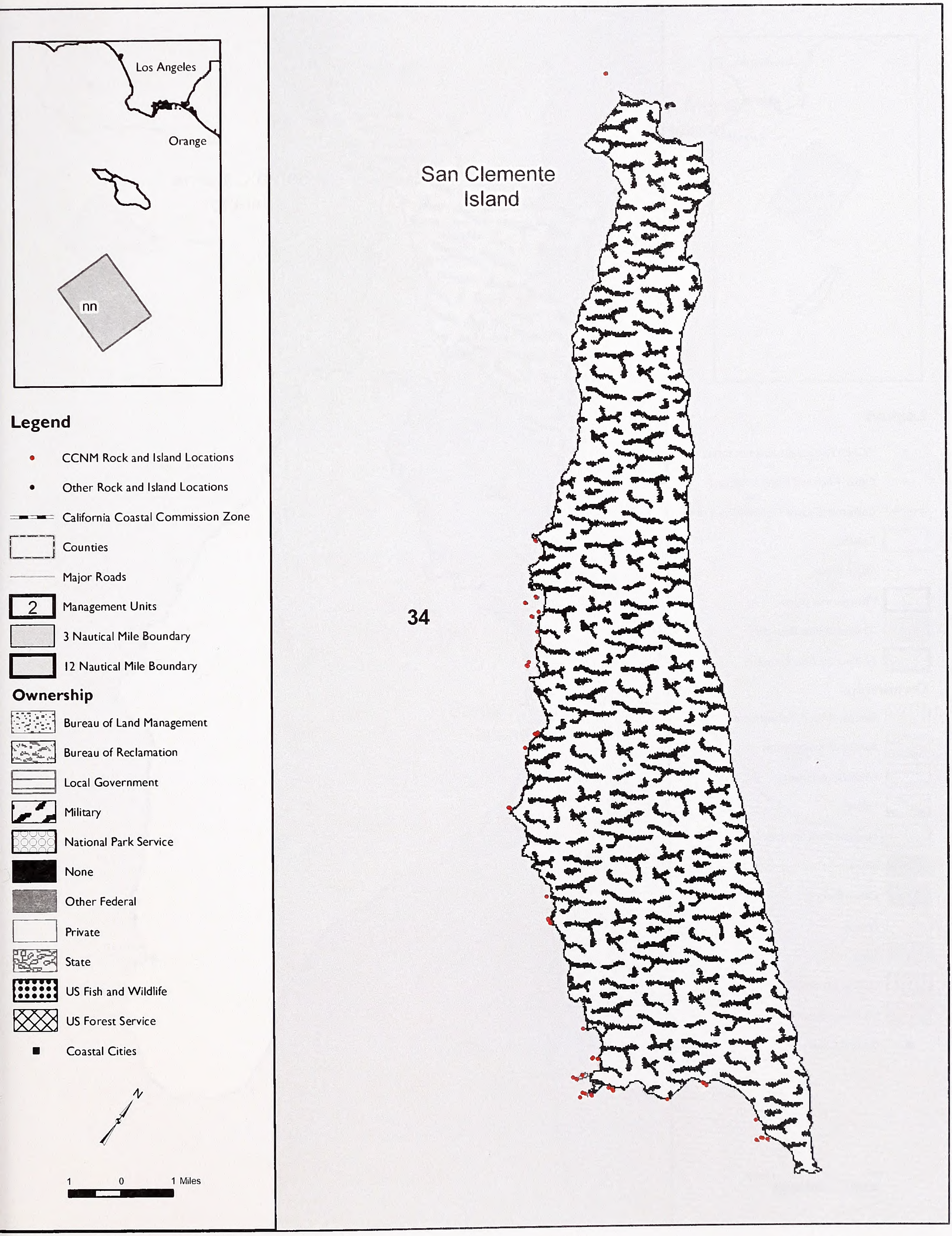
Legend
CCNM Rock and Island Locations
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1 0 1 Miles
32
33
La Jolla
52
Pacific Beach
Mission Beach
274
Clairemont
Bay Park
Ocean Beach
Sunset Cliffs
Azure Vista
Fleetridge
Loma Portal
209
Roseville
Mission Hills
Five Points
La Playa
Hillcrest
163
Fort Rosecrans
San Diego
Coronado
94
75
National City
75
Sunny Vista
Harbor Side
Imperial Beach
Castle Park
South San Diego
Palm City
Otay
Nestor

CCNM Sub-Units 32 and 33


Los Angeles
Orange
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Legend
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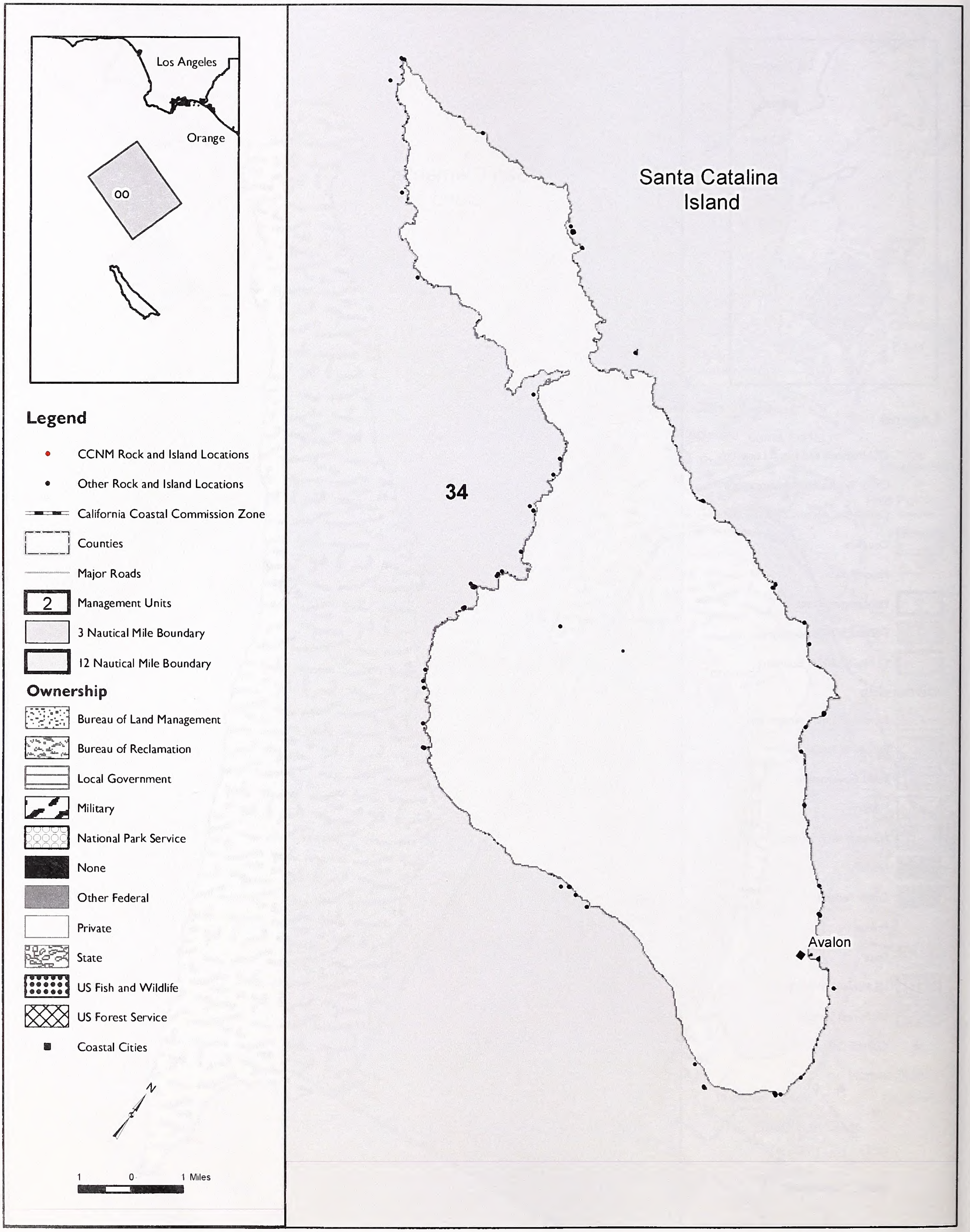
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1
0
1 Miles
San Clemente Island
34

CCNM Sub-Unit 34


Los Angeles
Orange
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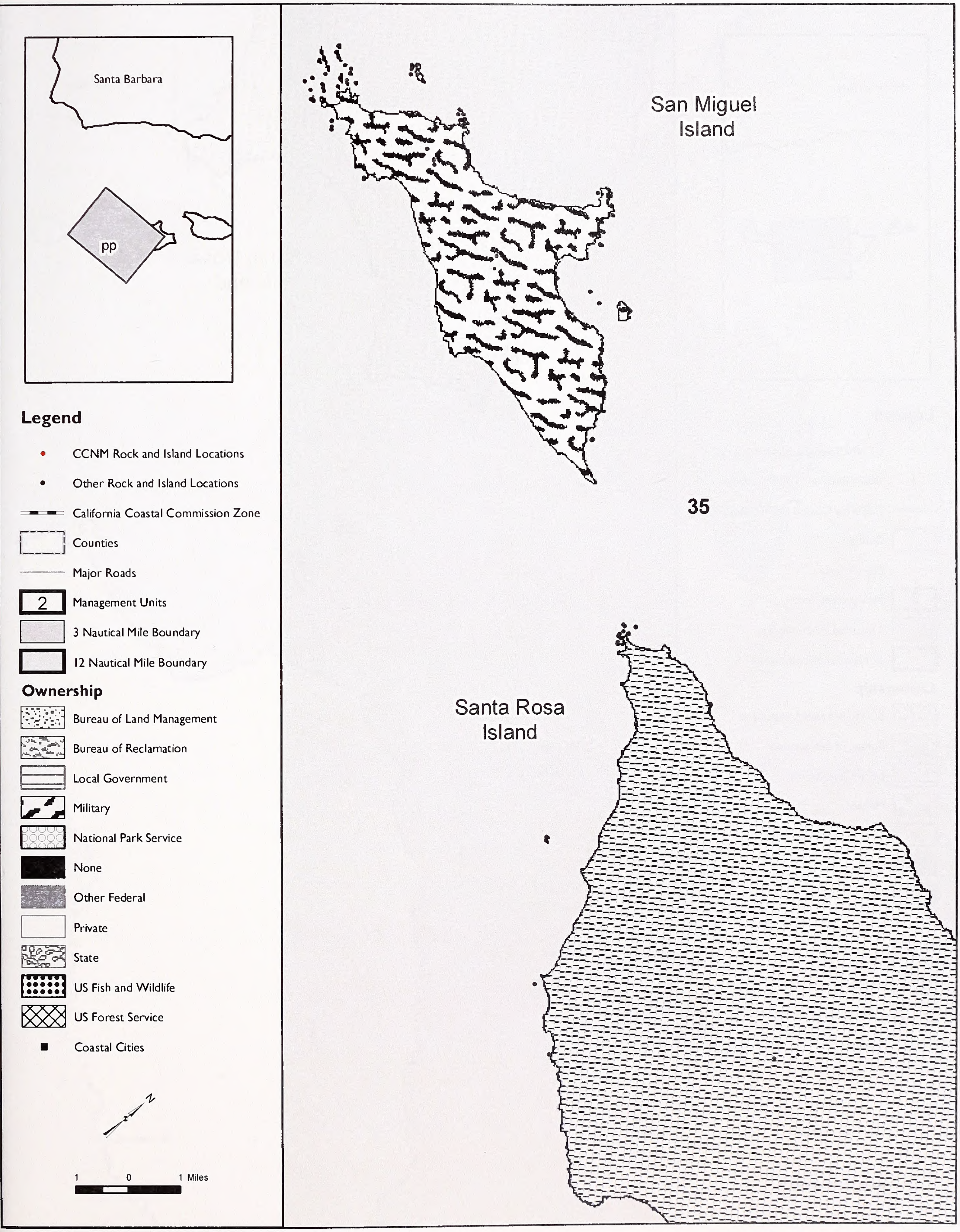
Legend
CCNM Rock and Island Locations
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1
0
1 Miles
Santa Catalina Island
34
Avalon

CCNM Sub-Unit 34


Santa Barbara
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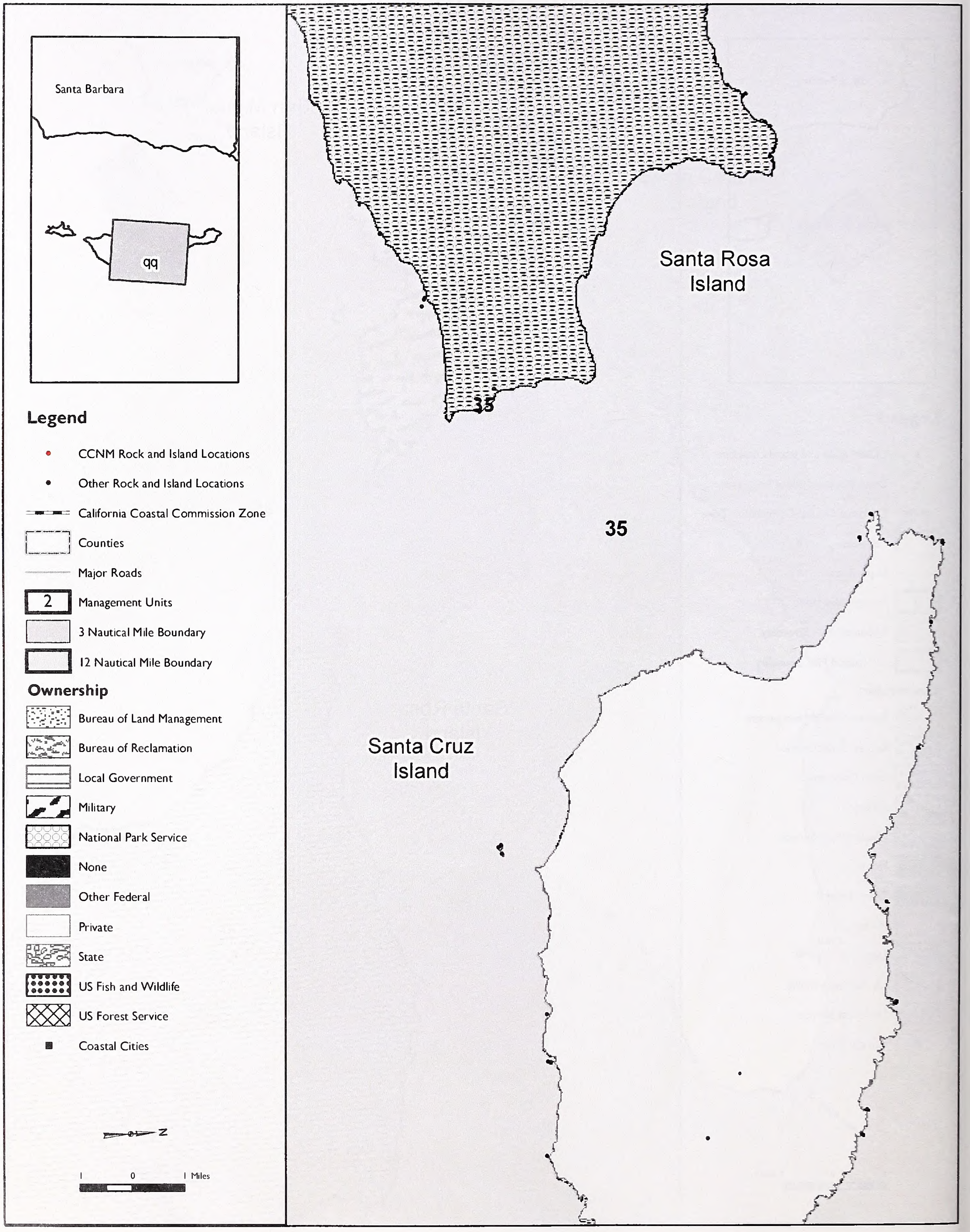
Legend
CCNM Rock and Island Locations
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2 Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1 0 1 Miles
San Miguel Island
35
Santa Rosa Island


Santa Barbara
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Legend
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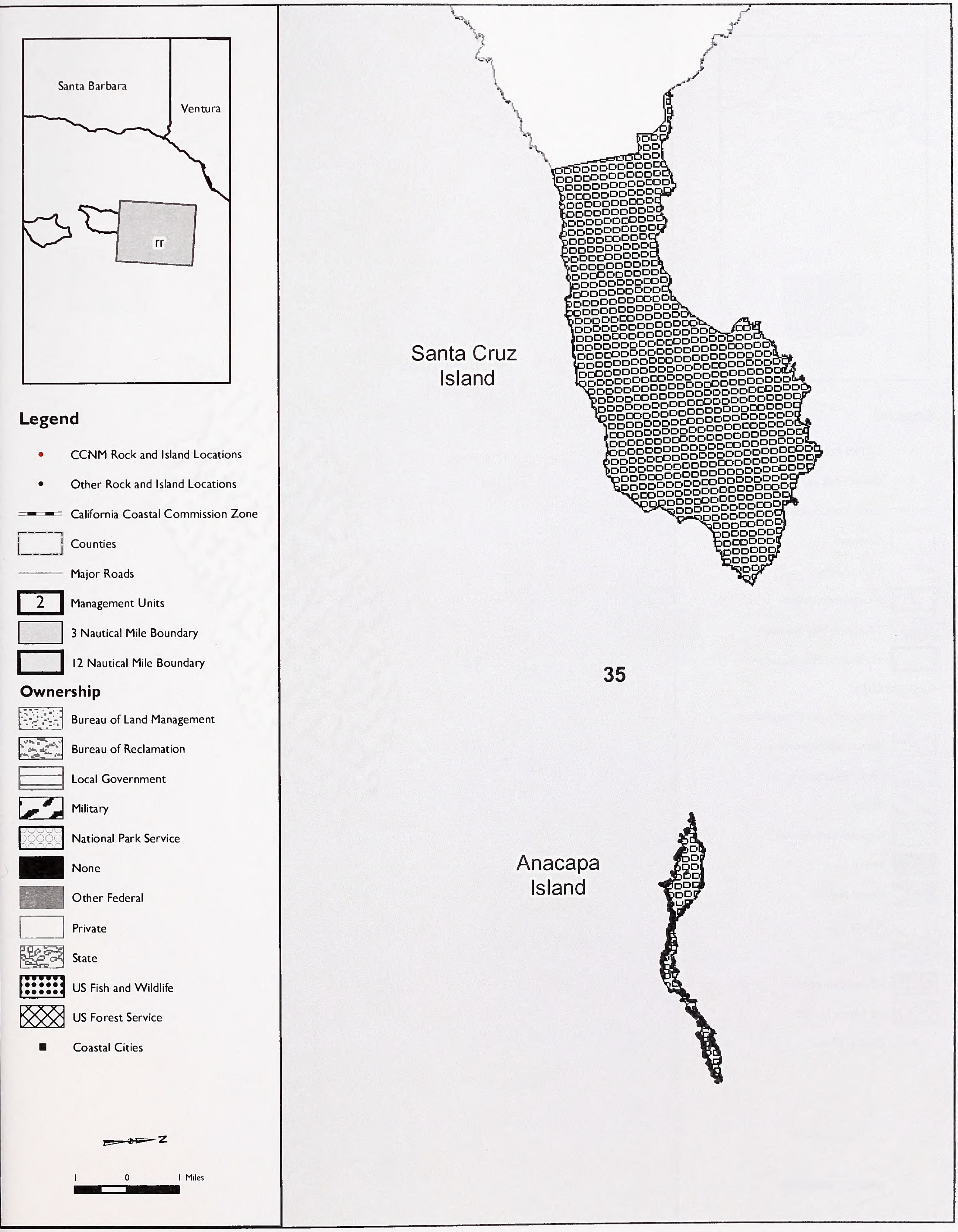
Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1
0
1 Miles
Santa Rosa Island
35
35
Santa Cruz Island

CCNM Sub-Unit 35


Santa Barbara
Ventura
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Legend
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Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2
Management Units
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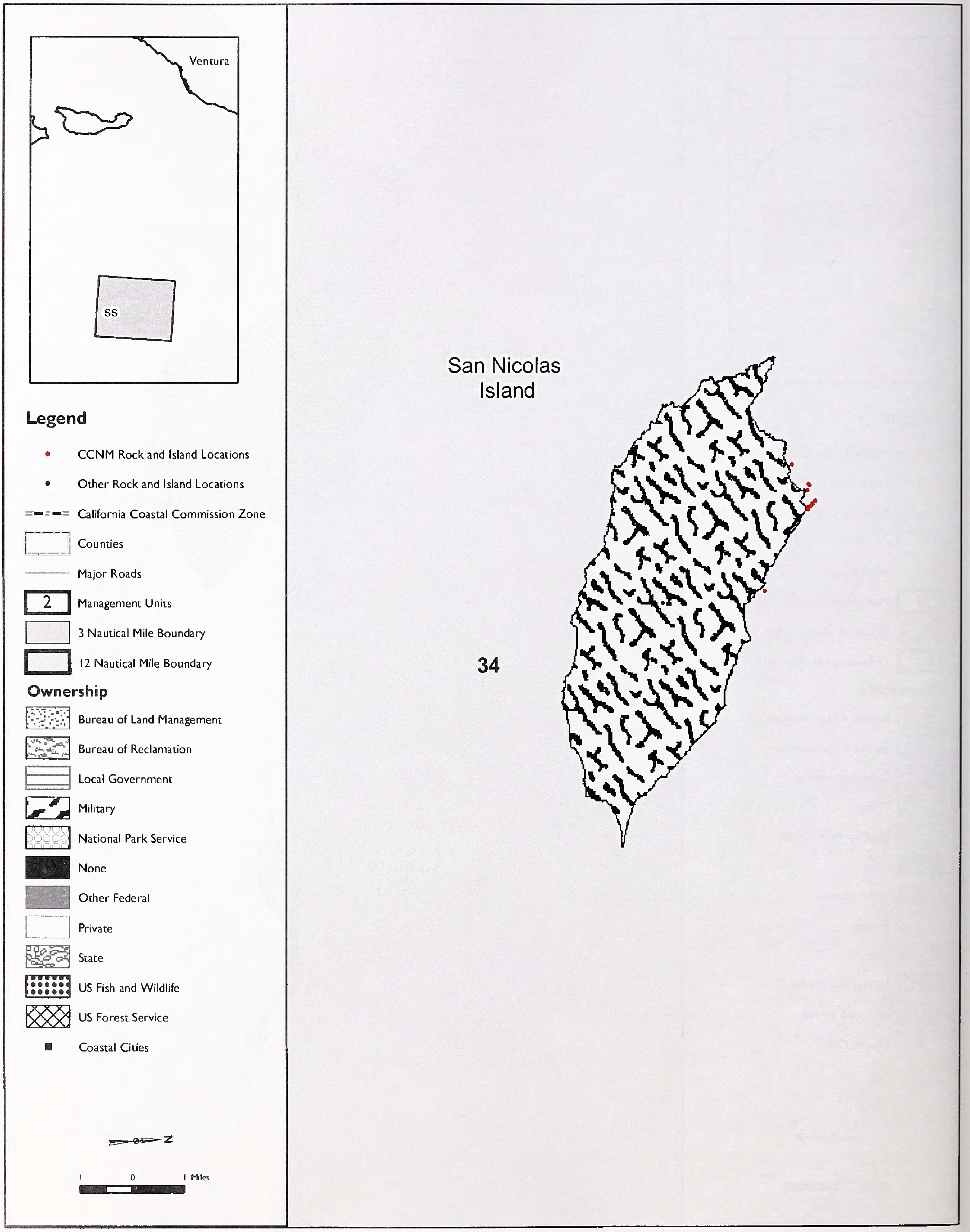
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
Coastal Cities
N
1 0 1 Miles
Santa Cruz Island
35
Anacapa Island

CCNM Sub-Unit 35


Ventura
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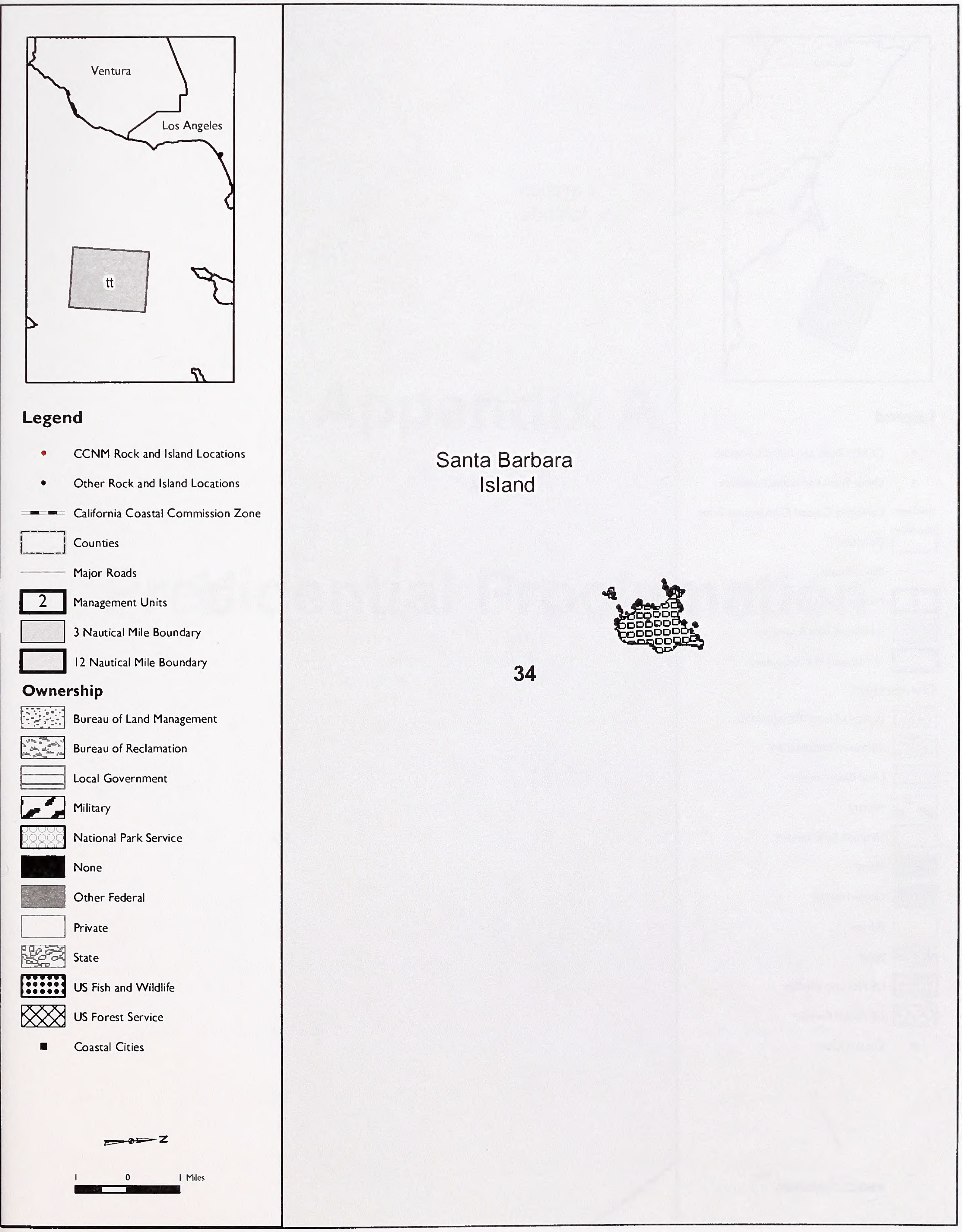
Counties
Major Roads
2 Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
■ Coastal Cities
N
1 0 1 Miles
San Nicolas Island
34

CCNM Sub-Unit 34


Ventura
Los Angeles
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Legend
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● Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2 Management Units
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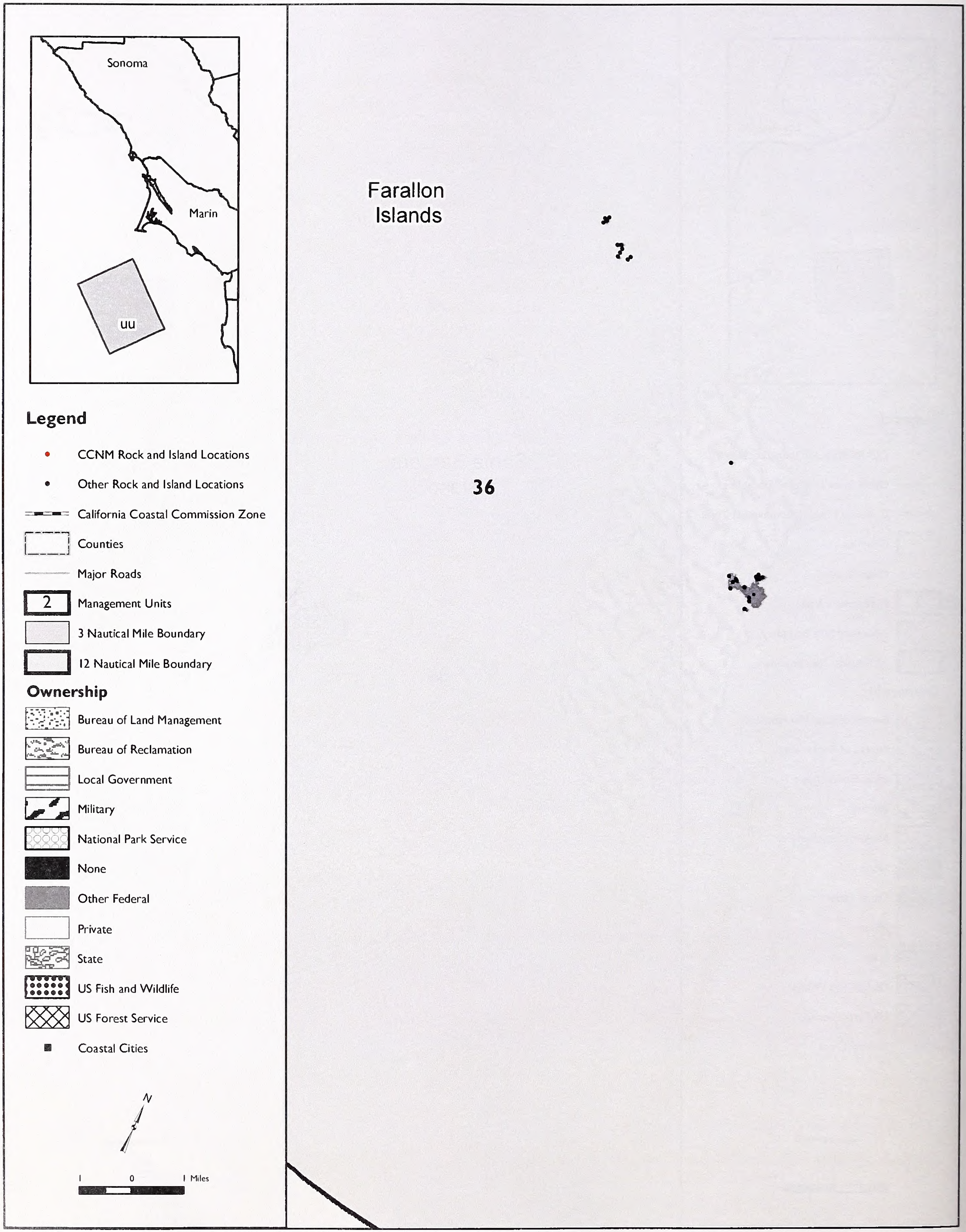
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
■ Coastal Cities
N
1 0 1 Miles
Santa Barbara Island
34


Sonoma
Marin
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Legend
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● Other Rock and Island Locations
California Coastal Commission Zone
Counties
Major Roads
2 Management Units
3 Nautical Mile Boundary
12 Nautical Mile Boundary
Ownership
Bureau of Land Management
Bureau of Reclamation
Local Government
Military
National Park Service
None
Other Federal
Private
State
US Fish and Wildlife
US Forest Service
■ Coastal Cities
N
1 0 1 Miles
Farallon Islands
36

CCNM Sub-Unit 36

Appendix A

Presidential Proclamation

Appendix A
Presidential Proclamation

THE WHITE HOUSE
Office of the Press Secretary
(Grand Canyon, Arizona)

For Immediate Release **January 11, 2000**

ESTABLISHMENT OF THE CALIFORNIA COASTAL NATIONAL MONUMENT

- - - - - - -

BY THE PRESIDENT OF THE UNITED STATES OF AMERICA
A PROCLAMATION

The islands, rocks, and pinnacles of the California Coastal National Monument overwhelm the viewer, as white-capped waves crash into the vertical cliffs or deeply crevassed surge channels and frothy water empties back into the ocean. Amidst that beauty lies irreplaceable scientific values vital to protecting the fragile ecosystems of the California coastline. At land's end, the islands, rocks, exposed reefs, and pinnacles off the coast above mean high tide provide havens for significant populations of sea mammals and birds. They are part of a narrow and important flight lane in the Pacific Flyway, providing essential habitat for feeding, perching, nesting, and shelter.

The California Coastal National Monument is a biological treasure. The thousands of islands, rocks, exposed reefs, and pinnacles are part of the nearshore ocean zone that begins just off shore and ends at the boundary between the continental shelf and continental slope. Waters of this zone are rich in nutrients from upwelling currents and freshwater inflows, supporting a rich array of habitats and organisms. Productive oceanographic factors, such as major ocean currents, stimulate critical biological productivity and diversity in both nearshore and offshore ocean waters.

The monument contains many geologic formations that provide unique habitat for biota. Wave action exerts a strong influence on habitat distribution within the monument. Beaches occur where wave action is light, boulder fields occur in areas of greater wave activity, and rocky outcroppings occur where wave action is greatest. The pounding surf within boulder fields and rocky shores often creates small, but important, habitats known as tidepools, which support creatures uniquely adapted for survival under such extreme physical conditions. Although shoreline habitats may appear distinct from those off shore, they are dependent upon each other, with vital and dynamic exchange of nutrients and organisms being essential to maintaining their healthy ecosystems. As part of California's nearshore ocean zone, the monument is rich in biodiversity and holds many species of scientific interest that can be particularly sensitive to disturbance.

The monument's vegetative character varies greatly. Larger rocks and islands contain diverse growth. Dudleya, Atriplex-Baeria-Rumex, mixed grass-herb, Polypodium, Distichlis, ice plant, Synthyris-Poppy, Eymus, Poa-Baeria, chapparal, and wetlands vegetation are all present. Larger rocks and islands contain a diverse blend of the vegetation types.

The monument provides feeding and nesting habitat for an estimated 200,000 breeding seabirds. Development on the mainland has forced seabirds that once fed and nested in the shoreline ecosystem to retreat to the areas protected by the monument. Pelagic seabird species inhabit salt or brackish water environments for at least part of their annual cycle and breed on offshore islands and rocks. Gulls, the endangered California least tern, the threatened brown pelican, and the snowy plover, among countless others, all feed on the vegetation and establish their nests in the monument. Both bald eagles and peregrine falcons are found within the monument.

The monument also provides forage and breeding habitat for several mammal species. Pinnipeds are abundant, including the threatened southern sea otter and the Guadalupe fur seal. The monument contains important shelter for male California sea lions in the winter and breeding rookeries for threatened northern (Steller) sea lions in the spring.

Section 2 of the Act of June 8, 1906 (34 Stat. 225, 16 U.S.C. 431) authorizes the President, in his discretion, to declare by public proclamation historic landmarks, historic and prehistoric structures, and other objects of historic or scientific interest that are situated upon the lands owned or controlled by the Government of the United States to be national monuments, and to reserve as a part thereof parcels of land, the limits of which in all cases shall be confined to the smallest area compatible with the proper care and management of the objects to be protected.

WHEREAS it appears that it would be in the public interest to reserve such lands as a national monument to be known as the California Coastal National Monument:

NOW, THEREFORE, I, WILLIAM J. CLINTON, President of the United States of America, by the authority vested in me by section 2 of the Act of June 8, 1906 (34 Stat. 225, 16 U.S.C. 431), do proclaim that there are hereby set apart and reserved as the California Coastal National Monument, for the purpose of protecting the objects identified above, all unappropriated or unreserved lands and interests in lands owned or controlled by the United States in the form of islands, rocks, exposed reefs, and pinnacles above mean high tide within 12 nautical miles of the shoreline of the State of California. The Federal land and interests in land reserved are encompassed in the entire 840 mile Pacific coastline, which is the smallest area compatible with the proper care and management of the objects to be protected.

The establishment of this monument is subject to valid existing rights.

All Federal lands and interests in lands within the boundaries of this monument are hereby appropriated and withdrawn from all forms of entry, location, selection, sale, leasing, or other disposition under the public land laws, including but not limited to withdrawal from location, entry, and patent under the mining laws, and from disposition under all laws relating to mineral and geothermal leasing, other than by exchange that furthers the protective purposes of the monument. Lands and interests in lands within the proposed monument not owned by the United States shall be reserved as a part of the monument upon acquisition of title thereto by the United States.

The Secretary of the Interior shall manage the monument through the Bureau of Land Management, pursuant to applicable legal authorities, to implement the purposes of this proclamation.
Nothing in this proclamation shall be deemed to revoke any existing withdrawal, reservation, or appropriation; however, the national monument shall be the dominant reservation.

Nothing in this proclamation shall enlarge or diminish the jurisdiction or authority of the State of California or the United States over submerged or other lands within the territorial waters off the coast of California.

Nothing in this proclamation shall affect the rights or obligations of any State or Federal oil or gas lessee within the territorial waters off the California coast.

Warning is hereby given to all unauthorized persons not to appropriate, injure, destroy, or remove any feature of this monument and not to locate or settle upon any of the lands thereof.

IN WITNESS WHEREOF, I have hereunto set my hand this eleventh day of January, in the year of our Lord two thousand, and of the Independence of the United States of America the two hundred and twenty-fourth.

WILLIAM J. CLINTON

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Appendix B

Memorandum of Understanding between BLM, DPR, and DFG for Management of the CCNM

MEMORANDUM OF UNDERSTANDING (MOU)
BETWEEN
THE BUREAU OF LAND MANAGEMENT, DEPARTMENT OF INTERIOR
AND
RESOURCE AGENCY OF CALIFORNIA
AND
THE CALIFORNIA DEPARTMENT OF FISH AND GAME
AND
THE CALIFORNIA DEPARTMENT OF PARKS AND RECREATION

Management of the California Coastal National Monument

Whereas, all unappropriated or unreserved lands and interest in lands owned or controlled by the United States in the form of islands, rocks, exposed reefs, and pinnacles above mean high tide within 12 nautical miles of the shoreline of the State of California were designated as the California Coastal National Monument (Monument) by Presidential Proclamation on January 11, 2000;

Whereas, the Monument was nationally recognized in the Proclamation as a biological and geological treasure, rich in biodiversity, and providing essential habitat for many species of scientific interest;

Whereas, Monument designation mandates the protection of historic and scientific objects, particularly wildlife species which normally inhabit the Monument area, and the designation limits management discretion that the Federal managers otherwise have;

Whereas, the Secretary of Interior manages the monument through the Bureau of Land Management (Bureau) and under the Bureau's existing authorities, subject to the overriding purpose of protecting the objects described in the Presidential Proclamation of January 11, 2000;

Whereas, the Secretary of Resources for the Resource Agency of California has responsibility for all nonstatutory marine and coastal resources management programs for the State of California pursuant to the 1991 amendments of the California Ocean Resources Management Act.

Whereas, the California Department of Fish and Game (CDFG) recognizes the crucial wildlife values of the lands within the Monument;

Whereas, the Bureau has always retained legal responsibility for the Monument area but the CDFG has been handling day-to-day management since 1983 under a mutually signed MOU called "Management of the California Islands Wildlife Sanctuary" (see Attachment A);

Whereas, the California Department of Parks and Recreation (CDPR) manages 25 percent of the coastline of California, including lands and waters adjacent to the Monument, and is a public trust agency with responsibilities for protecting the natural and historic values;

Whereas, the Bureau, the Secretary of Resources, CDFG, and CDPR are interested in management of the Monument as partners for the benefit of its natural and historic resources and are so authorized by appropriate federal or state legislation; and

Whereas, the Bureau, Secretary of Resources, CDFG, and CDPR recognize that the cooperation of other federal, state, local, and private entities which manage resources along the California coast are essential to ensure the protection of objects recognized in the Presidential Proclamation of January 11, 2000:

1. Bureau Authority.
    - A. Intergovernmental Cooperation Act (PL 91-648).
    - B. National Environmental Policy Act (PL 91-198).
    - C. Federal Land Policy and Management Act (PL 94-579).
2. State of California Authority.
    - A. California Fish and Game Code , Article 4, Section 1580, Ecological Reserves.
    - B. Title 14, California Code of Regulations, Chapter 11, Section 630, Ecological Reserves.
    - C. California Public Resources Code, Chapter 1, Section 5003
    - D. Public Resources Code 36000 et seq.

Now Therefore,

The Bureau, the Resources Agency, CDFG and CDPR Mutually Agree:

1. To collaborate in the management of the Monument by carrying over to this MOU the provisions of the Memorandum of Understanding signed in 1983 "Management of the California Islands Wildlife Sanctuary" but subject to:
    A. the conditions in the Presidential Proclamation for designation of the California Coastal National Monument,
    B. the recognition that BLM retains the ultimate legal responsibility for the area, and
    C. any additional agreements stated below.

2. To only authorize uses of the Monument within the constraints of the Proclamation and this agreement.

3. To authorize appropriate uses within the Monument only following consultation between the parties,

4. To work as partners in preserving the objects of historic and scientific interest outlined in the Presidential Proclamation of January 11, 2000.

5. To work as partners in mapping and understanding resources within the Monument as well as working with the public to explain the values of the Monument;

6. That this MOU and Memorandum of Understanding signed in 1983 (Attachment A) be considered an Interim MOU until the Bureau, Secretary of Resources, CDFG, and CDPR develop a new MOU which they mutually agree would accommodate additional interested coastal

partners and/or has revised or alternative provisions that benefit the purposes for which the Monument was designated.

7. That it is expressly stipulated and agreed by all parties that each and every provision in this MOU is subject to the laws of the State of California, the laws of the United States, and to the delegated authority assigned in each instance.

8. That nothing in this agreement shall be construed as obligating the parties hereto to expend funds, or for the future payment of money, in excess of appropriations authorized by law.

9. To accomplish all cooperative work under the provisions of this memorandum or supplemental memorandum of understanding or cooperative agreements without discrimination against any employee, or applicant for employment, because of race, creed, color, or national origin.

10. That this MOU shall become effective when signed by the designated representatives of the parties hereto and shall remain in force until terminated by mutual agreement, or by any party upon thirty days notice in writing to the other of its intention to terminate upon a date indicated.

Approved

Robert C. Hight

Director, California Department of
Fish and Game

5-31-00

Date

Approved

State Director, Bureau of Land Management

5/18/00

Date

Approved

Director, California Department of
Parks and Recreation

4/5/2000

Date

I CONCUR

Mary D. Nichols

Secretary for Resources, State of California

May 30, 2000

Date

Attachment A
MEMORANDUM OF UNDERSTANDING
BETWEEN
THE CALIFORNIA DEPARTMENT OF FISH AND GAME
AND
THE BUREAU OF LAND MANAGEMENT
DEPARTMENT OF INTERIOR

Management of the California Islands Wildlife Sanctuary

Whereas, the Bureau of Land Management (Bureau) is responsible for the rocks, islands, reefs and pinnacles lying off the coast of California which are presently unappropriated or reserved (other than by Executive Order 5326) and which lie above the mean high tide line; and

Whereas, the Bureau and the California Department of Fish and Game (Department) recognize the crucial value of these lands to wildlife, including the federally listed endangered Brown Pelican and threatened southern sea otter; and

Whereas, the Bureau has, through publication of Public Land Order (PLO) 6369, segregated the rocks, islands, reefs, and pinnacles off the coast of California from the action of the general public land laws, including the mining and mineral leasing laws; and

Whereas, the Bureau has, through PLO 6369, designated the California rocks and islands as the California Islands Wildlife Sanctuary; and

Whereas, the sanctuary is defined by the contents of PLO 6369 which states that it is "All of the islands, rocks, pinnacles, and reefs...situated in the Pacific Ocean off the coast of California, lying above the mean high tide from Oregon to the Mexican border...which are withdrawn from...settlement, sale, location, or entry under the general land laws, including the mining and mineral leasing laws, subject to valid existing rights....;" and;

Whereas, the Bureau and Department are both interested in management of the Sanctuary for the benefit of its wildlife resources and are so authorized by appropriate federal or state legislation:

1. Bureau Authority.
    - A. Intergovernmental Cooperation Act (PL 91-648).
    - B. National Environmental Policy Act (PL 91-198).
    - C. Federal Land Policy and Management Act (PL 94-579).
2. Department Authority.
    - A. California Fish and Game Code , Article 4, Section 1580, Ecological Reserves.
    - B. Title 14, California Administrative Code, Chapter 11, Section 630, Ecological Reserves; and

Whereas, the Department has the capability to manage offshore resources;

Now Therefore,

The Bureau Agrees:

1. To turn over management responsibilities of the Sanctuary to the Department.

2. To only authorize use of the Sanctuary within the constraints of PLO 6369 and this agreement.

3. To authorize appropriate uses within the Sanctuary only following consultation and concurrence by the Department.

The Department Agrees:

1. To be responsible for management of the Sanctuary.

2. A. To only allow public uses of the Sanctuary which are consistent and compatible with the protection and conservation of the wildlife resources.

   B. During the nesting season (April 1 - August 15), to only allow activities demonstrated as non-detrimental to breeding pelagic birds.

   C. To prohibit removal of vegetation, minerals, or other products having commercial value.

3. To conduct, when feasible, biological surveys at seasons appropriate for estimating breeding bird and marine mammal populations by species. Such data will be reported to the Bureau so trend analysis can be made.

4. To allow entry into the Sanctuary by agents of the United States government when on official duty status.

5. To insure that authorized use does not significantly alter the Sanctuary's capacity to support wildlife.

6. To consult with the Bureau on any matters pertaining to the Sanctuary which are above and beyond the intent of this Memorandum of Understanding, e.g., leasing on submergent lands, other activities which could significantly affect the objectives of the Sanctuary.

It is Mutually Agreed:

1. It is expressively stipulated and agreed by both parties that each and every provision in this Memorandum of Understanding is subject to the laws of the State of California, the laws of the United States, and to the delegated authority assigned in each instance.

2. Nothing in this agreement shall be construed as obligating either agency hereto in the expenditures of funds, or for the future payment of money, in excess of appropriations authorized by law.

3. That no member of, or delegate to Congress, or Resident Commissioner, shall be admitted to any share of part of this agreement, or to any benefit that may arise therefrom.

4. To accomplish all cooperative work under the provisions of this memorandum or supplemental memorandum of understanding or cooperative agreements without discrimination against any employee, or applicant for employment, because of race, creed, color, or national origin.

5. This Memorandum or Understanding shall become effective when signed by the designated representatives of the parties hereto and shall remain in force until terminated by mutual agreement, or by either party upon thirty days

notice in writing to the other of its intention to terminate upon a date indicated. Amendments to this MOU may be proposed by either party and shall become effective upon approval by both parties.

Approved	Approved
E.C. Fullertan Director, California Department of Fish and Game	Ed Hastey State Director, Bureau of Land Management
May 13, 1983 Date	May 23, 1983 Date
I CONCUR	I CONCUR
Gordon VanVleck Secretary for Resources, State of California	Robert Burford Director, Bureau of Land Management
May 24, 1983 Date	May 24, 1983 Date

Approved by the Department of General Services - May 13, 1983

Appendix C

Calfornia Code of Regulations, Title 14, Section 6

AppendixC

Title 14, Section 630 of the California Code of Regulations

California Code of Regulations
Title 14. Natural Resources
Division 1. Fish and Game Commission – Department of Fish and Game
Chapter 11. Ecological Reserves.

§ 630. Ecological Reserves.

The areas specified in this chapter have been declared by the Fish and Game Commission to be ecological reserves. A legal description of the boundaries of each ecological reserve is on file at the department's headquarters, 1416 Ninth Street, Sacramento. Ecological reserves are established to provide protection for rare, threatened or endangered native plants, wildlife, aquatic organism and specialized terrestrial or aquatic habitat types. Public entry and use of ecological reserves shall be compatible with the primary purposes of such reserves, and subject to the following applicable general rules and regulations, except as otherwise provided for in the special area regulations:

(a) General Rules and Regulations:

(1) **Protection of Resources**. No person shall mine or disturb geological formations or archeological artifacts or take or disturb any bird or nest, or eggs thereof, or any plant, mammal, fish, mollusk, crustacean, amphibian, reptile, or any other form of plant or animal life in an ecological reserve except as provided in subsections 630 (a)(2) and (a)(8). The department may implement enhancement and protective measures to assure proper utilization and maintenance of ecological reserves.

(2) **Fishing**. Fishing shall be allowed in accordance with the general fishing regulations of the commission except that the method of taking fish shall be limited to angling from shore. No person shall take fish for commercial purposes in any ecological reserve except by permit from the commission.

(3) **Collecting**. No collecting shall be done in an ecological reserve except by permit issued pursuant to section 650 of these regulations. Any person applying for a permit must have a valid scientific collecting permit issued pursuant to part 3 of this title.

(4) **Motor Vehicles**. No person shall drive, operate, leave, or stop any motor vehicle, bicycle, tractor, or other type of vehicle in an ecological reserve except on designated access roads and parking areas.

(5) **Swimming**. No person shall swim, wade, dive, or use any diving equipment within an ecological reserve except as authorized under the terms of a permit issued pursuant to subsection (3).

(6) **Boating**. No person shall launch or operate a boat or other floating device within an ecological reserve except by permit from the commission.

(7) **Trails**. The department may designate areas within an ecological reserve where added protection of plant or animal life is desirable, and may establish equestrian or walking trails or paths within such designated areas. No person shall walk or ride horseback in such areas except upon the established trails or paths.

(8) **Firearms**. No person shall fire or discharge any firearm, bow and arrow, air or gas gun, spear gun, or any other weapon of any kind within or into an ecological reserve or possess such weapons within an ecological reserve, except law enforcement personnel and as provided for in individual area regulations that allow for hunting.

(9) **Ejection**. Employees of the department may eject any person from an ecological reserve for violation of any of these rules or regulations or for any reason when it appears that the general safety or welfare of the ecological reserve or persons thereon is endangered.

(10) **Public Entry**. Public entry may be restricted on any area at the discretion of the department to protect the wildlife, aquatic life, or habitat. No person, except state and local law enforcement officers, fire suppression agencies and employees of the department in the performance of their official duties or persons possessing written permission from the department, may enter any ecological reserve, or portion thereof, which is closed to public entry. No person may enter any Ecological Reserve between sunset and sunrise except with written permission from the Department, which may be granted for purposes including night fishing in accordance with subsection (a)(2) from designated shore areas only.

A $2.00 day use pass or a valid $10.00 annual wildlife pass is required of all users of Elkhorn Slough and Upper Newport Bay ecological reserves except for users that possess a valid California sport fishing license hunting license or trapping license, or users that are under 16 years of age or users that are part of an organized youth or school group and having free permits issued by the appropriate regional office. Refer to subsection 550(b)(16)(B), Title 14, CCR, for regulations for fee requirements for wildlife areas.

(11) Introduction of Species. Unless authorized by the commission, the release of any fish or wildlife species, including domestic or domesticated species, or the introduction of any plant species, is prohibited. The department may reintroduce endemic species on ecological reserves for management purposes.

(12) **Feeding of Wildlife**. The feeding of wildlife is prohibited.

(13) **Pesticides**. The use of pesticides is prohibited on any ecological reserve unless authorized by the commission with the exception that the department may use pesticides for management purposes and for public safety.

(14) **Litter**. No person shall deposit, drop, or scatter any debris on any ecological reserve except in a receptacle or area designated for that purpose. Where no designated receptacles are provided, any refuse resulting from a person's use of an area must be removed from that area by such person.

(15) **Grazing**. The grazing of livestock is prohibited on any ecological reserve.

(16) **Falconry**. Falconry is prohibited.

(17) **Aircraft**. No person shall operate any aircraft or hovercraft within a reserve, except as authorized by a permit from the commission.

(18) **Pets**. Pets, including dogs and cats, are prohibited from entering reserves unless they are retained on a leash of less than ten feet or are inside a motor vehicle, except as provided for in individual area regulations that allow for hunting or training activities.

(19) **Fires**. No person shall light fireworks or other explosive or incendiary devices, or start or maintain any fire on or in any reserve, except for management purposes as provided in subsection (a)(1).

(20) **Camping**. No person shall camp on/in any ecological reserve.

(21) **Vandalism**. No person shall tamper with, damage or remove any property not his own when such property is located within an ecological reserve.

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Appendix D

Preliminary Lists of Known Seabird and Marine Mammal Sites in the CCNM

Table D-1. Preliminary List of Known Bird Sites in the CCNM

Sub-Unit[1]	County	Name	Latitude	Longitude	Species of Concern
1. Pelican Bay	Del Norte	Cone Rock	41.9733	-124.2173	Nesting site for western gull, pigeon guillemot, and pelagic cormorant
2. Crescent City	Del Norte	Tolowa Rocks	41.7542	-124.2333	Nesting site for fork-tailed storm-petrel, Leach's storm-petrel, pelagic cormorant, black oystercatcher, western gull, and pigeon guillemot
4. Trinidad	Humboldt	Rocks from Palmers Point to Scotty Point (except Sea Gull Rock)	41.1237	-124.1621	Nesting site for black oystercatcher, pelagic cormorant, pigeon guillemot, and western gull
		Rocks from Scotty Point to Megwill Point (except 018-021)	41.1017	-124.1650	Nesting site for black oystercatcher, Brandt's cormorant, pelagic cormorant, pigeon guillemot, and western gull
		Redding Rock	41.3403	-124.1774	Nesting site for Brandt's cormorant, western gull, common murre, and pigeon guillemot
		Green Rock	41.0758	-124.1649	Nesting site for fork-tailed storm-petrel, Leach's storm-petrel, Brandt's cormorant, pelagic cormorant, black oystercatcher, western gull, common murre, pigeon guillemot, Cassin's auklet, rhinoceros auklet, and tufted puffin
		Puffin Rock	41.0719	-124.1602	Nesting site for pelagic cormorant, black oystercatcher, western gull, pigeon guillemot, and tufted puffin
		Little Pewotole Rock	41.0653	-124.1517	Nesting site for pelagic cormorant and black oystercatcher
		Flatiron Rock	41.0594	-124.1618	Nesting site for Leach's storm-petrel, Brandt's cormorant, pelagic cormorant, black oystercatcher, western gull, common murre, pigeon guillemot, Cassin's auklet, and tufted puffin
		Blank Rock	41.0550	-124.1585	Nesting site for fork-tailed storm-petrel, Leach's storm-petrel, Brandt's cormorant, pelagic cormorant, black oystercatcher, western gull, common murre, pigeon guillemot, and tufted puffin
		Prisoner Rock	41.0525	-124.1436	Nesting site for fork-tailed storm-petrel, Leach's storm-petrel, pelagic cormorant, western gull, and pigeon guillemot
		Pilot Rock	41.0435	-124.1510	Nesting site for Brandt's cormorant, pelagic cormorant, black oystercatcher, western gull, common murre, and pigeon guillemot
		Trinidad Bay Rocks	41.0500	-124.1333	Nesting site for pelagic cormorant, fork-tailed storm-petrel, Leach's storm-petrel, black oystercatcher, western gull, and pigeon guillemot
		Little River Rock	41.0354	-124.1222	Nesting site for fork-tailed storm-petrel, Leach's storm-petrel, double-crested cormorant, pelagic cormorant, black oystercatcher, western gull, pigeon guillemot, rhinoceros auklet, and tufted puffin
6. Lost Coast	Humboldt and Mendocino	False Cape Rocks	40.5100	-124.3953	Nesting site for Brandt's cormorant, pelagic cormorant, black oystercatcher, western gull, common murre, and pigeon guillemot
		Steamboat Rock	40.4154	-124.4028	Nesting site for Brandt's cormorant, pelagic cormorant, western gull, common murre, and pigeon guillemot
		Sea Lion Rock	40.3267	-124.3604	Nesting site for western gull, cormorant spp., probably mislocated on the map in Sowls et al. page 93. I think this is the more likely location (rlev)
		Three Brothers and Hair Seal Rocks	40.3261	-124.3547	Nesting site for Brandt's cormorant, pelagic cormorant, and western gull
		Cormorant Hotel Rocks	40.0361	-124.0804	Nesting site for pelagic cormorant and western gull
		Point No Pass Rocks	39.9707	-123.9935	Nesting site for pelagic cormorant, pigeon guillemot, and western gull

Table D-1. Preliminary List of Known Bird Sites in the CCNM

Sub-Unit[1]	County	Name	Latitude	Longitude	Species of Concern
		High Tip Rocks	39.9205	-123.9530	Nesting site for black oystercatcher, pelagic cormorant, pigeon guillemot, and western gull
		Anderson Cliffs Rocks	39.8739	-123.9138	Nesting site for Brandt's cormorant, pelagic cormorant, pigeon guillemot, and western gull
		Mistake Point to Big White Rock	39.8537	-123.8962	Nesting site for pelagic cormorant, pigeon guillemot, and western gull
7. Cape Vizcaino/Westport	Mendocino	Usal Bay Rocks	39.8101	-123.8467	Nesting site for pelagic cormorant, pigeon guillemot, and western gull
		Soldier Frank Point Rocks	39.7568	-123.8395	Nesting site for pelagic cormorant, pigeon guillemot, and western gull
		Chris Rocks	39.7144	-123.8178	Nesting site for pelagic cormorant and western gull
		Hardy Rock and Union Landing Rocks	39.7020	-123.8061	Nesting site for pelagic cormorant, pigeon guillemot, and western gull
		Westport Rocks	39.6895	-123.7962	Nesting site for black oystercatcher, pelagic cormorant, pigeon guillemot, and western gull
		Chadbourne Rocks	39.6172	-123.7833	Nesting site for pelagic cormorant
		Strawberry Cove Rocks	39.5936	-123.7861	Nesting site for black oystercatcher, pelagic cormorant, and pigeon guillemot
		Kibesillah Rock	39.5803	-123.7808	Nesting site for Brandt's cormorant, pelagic cormorant, and western gull
		Newport Rocks	39.5803	-123.7808	Nesting site for black oystercatcher, pelagic cormorant, pigeon guillemot, and western gull
8. Fort Bragg/Mendocino	Mendocino	Georgia Pacific	39.4404	-123.8226	Nesting site for black oystercatcher, pelagic cormorant, and western gull
		Caspar Anchorage Rocks	39.3660	-123.8227	Nesting site for Brandt's cormorant, pelagic cormorant, and pigeon guillemot
		Point Cabrillo to Jack Peters Gulch Rocks	39.3378	-123.8197	Nesting site for black oystercatcher, pelagic cormorant, and pigeon guillemot
		Goat Island Area	39.3095	-123.8120	Nesting site for black oystercatcher, Brandt's cormorant, pelagic cormorant, pigeon guillemot, tufted puffin, and western gull
		Brewery Gulch Rocks	39.2930	-123.7970	Nesting site for black oystercatcher, pelagic cormorant, and pigeon guillemot
9. Van Damme/Navarro Head	Mendocino	Van Damme Cove Rocks	39.2694	-123.7966	Nesting site for black oystercatcher, pelagic cormorant, pigeon guillemot, tufted puffin, and western gull
		Schoolhouse Creek to Albion River Rocks	39.2442	-123.7823	Nesting site for black oystercatcher, pelagic cormorant, pigeon guillemot, and western gull
10. Elk	Mendocino	Devils Basin Rocks	39.1760	-123.7552	Nesting site for black oystercatcher, Brandt's cormorant, pelagic cormorant, pigeon guillemot, and western gull
		Cavanaugh Cove to Gunderson Rock (except Warf Rock (008) and Casket Rock (009))	39.1391	-123.7363	Nesting site for black oystercatcher, Brandt's cormorant, pelagic cormorant, pigeon guillemot, and western gull
		Casket Rock	39.1307	-123.7260	Nesting site for Brandt's cormorant, pelagic cormorant, pigeon guillemot, and western gull
		Wharf Rocks	39.1306	-123.7224	Nesting site for black oystercatcher, pelagic cormorant, pigeon guillemot, and western gull
		Bonee Cliffs Rocks	39.1144	-123.7154	Nesting site for pelagic cormorant and pigeon guillemot
		White Rock	39.0951	-123.7185	Nesting site for Brandt's cormorant, common murre, pelagic cormorant, pigeon guillemot, and western gull
		Bridgeport Landing Rocks	39.0610	-123.6962	Nesting site for pelagic cormorant and western gull
		Mallo Pass Creek Rocks	39.0389	-123.6970	Nesting site for pelagic cormorant, pigeon guillemot, and western gull
11. Point Arena	Mendocino	Point Arena Rocks	38.9569	-123.7375	Nesting site for black oystercatcher, pelagic cormorant, and pigeon guillemot
12. Saunders Reef/Gualala	Mendocino	Saunders Landing Rocks	38.8536	-123.6514	Nesting site for pelagic cormorant and pigeon guillemot

Table D-1. Preliminary List of Known Bird Sites in the CCNM

Sub-Unit[1]	County	Name	Latitude	Longitude	Species of Concern
		Section 30 Cove Rocks	38.8773	-123.6694	Nesting site for pigeon guillemot
		Iverson Landing Rocks	38.8450	-123.6471	Nesting site for black oystercatcher, pelagic cormorant, and pigeon guillemot
		Triplett Gulch Rocks	38.8155	-123.6046	Nesting site for black oystercatcher, pelagic cormorant, and pigeon guillemot
		Fish Rock Cove	38.8013	-123.5800	Nesting site for Brandt's cormorant and pelagic cormorant
		Fish Rocks	38.8000	-123.5919	Nesting site for black oystercatcher, Brandt's cormorant, Leach's storm-petrel, pelagic cormorant, pigeon guillemot, rhinoceros auklet, tufted puffin, and western gull
		Collins Landing to Gualala River Rocks	38.7781	-123.5555	Nesting site for black oystercatcher, pelagic cormorant, pigeon guillemot, and western gull
13. Sea Ranch/Fort Ross	Sonoma	Gualala Point Island	38.7509	-123.5277	Nesting site for Brandt's cormorant, pigeon guillemot, and western gull
		Del Mar Point Rock	38.7441	-123.5182	Nesting site for pelagic cormorant
		Sea Ranch Rocks	38.7047	-123.4532	Nesting site for black oystercatcher, pelagic cormorant, pigeon guillemot, and western gull
		Black Point to Stewarts Point	38.6664	-123.4180	Nesting site for pelagic cormorant and pigeon guillemot
		Stewarts Point to Rocky Point	38.6420	-123.4003	Nesting site for pelagic cormorant, pigeon guillemot, and western gull
		Horseshoe Cove Rocks	38.6112	-123.3738	Nesting site for pelagic cormorant and pigeon guillemot
		Gerstle Cove to Stillwater Cove	38.5521	-123.3107	Nesting site for pelagic cormorant, pigeon guillemot, and western gull
		Bench Mark 125 to Timber Cove	38.5363	-123.2844	Nesting site for pelagic cormorant and western gull
		Northwest Cape Rocks	38.5159	-123.2606	Nesting site for pelagic cormorant and western gull
14. Sonoma Coast	Sonoma	Russian Gulch Rocks	38.4674	-123.1619	Nesting site for black oystercatcher, pelagic cormorant, pigeon guillemot, and western gull
		Russian River Overlook Rocks	38.4542	-123.1457	Nesting site for Brandt's cormorant, double-crested cormorant, pelagic cormorant, pigeon guillemot, and western gull
		Arched Rock	38.4329	-123.1253	Nesting site for black oystercatcher, Brandt's cormorant, pigeon guillemot, tufted puffin, and western gull
		Peaked Hill Rock	38.4292	-123.1194	Nesting site for black oystercatcher, pelagic cormorant, pigeon guillemot, and western gull
		Gull Rock	38.4248	-123.1199	Nesting site for Brandt's cormorant, pelagic cormorant, pigeon guillemot, and western gull
		Shell-Wright Beach Rocks	38.4082	-123.1080	Nesting site for black oystercatcher, pelagic cormorant, pigeon guillemot, and western gull
		Duncan Point to Arched Rock	38.3812	-123.0843	Nesting site for black oystercatcher, pelagic cormorant, pigeon guillemot, and western gull
15. Bodega Head	Sonoma	Bodega Head Rocks	38.3074	-123.0685	Nesting site for black oystercatcher, pelagic cormorant, and pigeon guillemot
		Pinnacle Rock	38.3068	-123.0193	Nesting site for black oystercatcher, pelagic cormorant, pigeon guillemot, and western gull
		Bodega Rock	38.2967	-123.0472	Nesting site for black oystercatcher, Brandt's cormorant, and western gull
		Sonoma-Marin County Line Rocks	38.2885	-122.9996	Nesting site for black oystercatcher, Brandt's cormorant, pelagic cormorant, pigeon guillemot, and western gull
16. Point Reyes/GGNRA	Marin and San Francisco	Dillon Beach Rocks	38.2691	-122.9832	Nesting site for black oystercatcher, Brandt's cormorant, double-crested cormorant, pelagic cormorant, pigeon guillemot, and western gull
17. San Mateo/Santa Cruz	San Mateo and Santa Cruz	San Pedro Rock	37.5953	-122.5222	Nesting site for black oystercatcher, cormorant (unidentified), pelagic cormorant, pigeon guillemot, and western gull

Table D-1. Preliminary List of Known Bird Sites in the CCNM

Sub-Unit[1]	County	Name	Latitude	Longitude	Species of Concern
		Devils Slide Rock	37.5757	-122.5209	Nesting site for black oystercatcher, Brandt's cormorant, common murre, pelagic cormorant, pigeon guillemot, and western gull
		Pillar Point Rocks	37.4960	-122.5007	Nesting site for pelagic cormorant and pigeon guillemot
		Martins Beach Rocks	37.3636	-122.4093	Nesting site for black oystercatcher, Brandt's cormorant, pelagic cormorant, and pigeon guillemot
		Pigeon Point Rocks	37.1819	-122.3889	Nesting site for black oystercatcher and pigeon guillemot
		Greyhound Rock to Davenport Rocks	37.0440	-122.2497	Nesting site for black oystercatcher, Brandt's cormorant, pelagic cormorant, and pigeon guillemot
		Davenport to Pt. Santa Cruz Rocks	36.9532	-122.1344	Nesting site for black oystercatcher, pelagic cormorant, pigeon guillemot, and western gull
19. Monterey Peninsula	Monterey	Pescadero Rock	36.5619	-121.9432	Nesting site for black oystercatcher and western gull
20. Big Sur	Monterey	Pinnacle Point Area Rocks	36.5257	-121.9544	Nesting site for black oystercatcher, Brandt's cormorant, pelagic cormorant, pigeon guillemot, and western gull
		Castle Rocks	36.3759	-121.9075	Nesting site for black oystercatcher, ashy storm-petrel, Brandt's cormorant, Cassin's auklet, common murre, pelagic cormorant, pigeon guillemot, and western gull
		Hurricane Point Rocks	36.3627	-121.9078	Nesting site for ashy storm-petrel, black oystercatcher, Brandt's cormorant, common murre, pelagic cormorant, pigeon guillemot, tufted puffin, and western gull
		Point Sur Rocks	36.3045	-121.9034	Nesting site for black oystercatcher, pelagic cormorant, pigeon guillemot, and western gull
		Molera Rock	36.2792	-121.8583	Nesting site for pelagic cormorant, pigeon guillemot, and western gull
		Cooper Point Rocks and Islands	36.2473	-121.8353	Nesting site for Brandt's cormorant, pelagic cormorant, and pigeon guillemot
		Pfeiffer Point Rocks	36.2321	-121.8107	Nesting site for Brandt's cormorant, cormorant (unidentified), pelagic cormorant, and pigeon guillemot
		Grimes Point Rocks	36.2038	-121.7383	Nesting site for black oystercatcher, Brandt's cormorant, pelagic cormorant, and pigeon guillemot
		Lafler Rock	36.1992	-121.7268	Nesting site for Brandt's cormorant, pelagic cormorant, and pigeon guillemot
		Torre Canyon Rocks	36.1903	-121.7128	Nesting site for black oystercatcher, Brandt's cormorant, pelagic cormorant
		Partington Ridge North Rocks	36.1683	-121.6872	Nesting site for black oystercatcher, Brandt's cormorant, double-crested cormorant, pelagic cormorant, pigeon guillemot, and western gull
		McWay Rocks	36.1630	-121.6785	Nesting site for black oystercatcher, Brandt's cormorant, pigeon guillemot, and western gull
		Partington Ridge South Rocks	36.1607	-121.6761	Nesting site for pelagic cormorant, pigeon guillemot, and western gull
		Anderson Canyon Rock	36.1532	-121.6688	Nesting site for Brandt's cormorant and pelagic cormorant
		Burns Creek Rocks	36.1429	-121.6585	Nesting site for Brandt's cormorant, cormorant (unidentified), pigeon guillemot, and western gull
		Square Black Rock	36.0725	-121.6097	Nesting site for Brandt's cormorant
		Bench Mark 227X	?	?	Nesting site for ashy storm-petrel, Brandt's cormorant, common mure, pigeon guillemot, and western gull.
		Bench Mark 247 Rocks	36.0360	-121.5801	Nesting site for pelagic cormorant
		Lopez Rock	36.0263	-121.5794	Nesting site for Brandt's cormorant
		Rockland Landing North Rocks	36.0138	-121.5375	Nesting site for Brandt's cormorant and pelagic cormorant
		Larus Rock	35.9619	-121.4846	Nesting site for black oystercatcher, pelagic cormorant, and western gull
		Unnamed Point Rocks	35.9492	-121.4823	Nesting site for black oystercatcher, pelagic cormorant, and western gull

Table D-1. Preliminary List of Known Bird Sites in the CCNM

Sub-Unit[1]	County	Name	Latitude	Longitude	Species of Concern
		North and East of Plaskett Rock	35.9212	-121.4731	Nesting site for black oystercatcher, pelagic cormorant, pigeon guillemot, and western gull
		Unnamed Rock	35.8847	-121.4628	Nesting site for black oystercatcher, Brandt's cormorant, pelagic cormorant, and western gull
		Seastack South of Redwood Gulch	35.8306	-121.3963	Nesting site for black oystercatcher, pelagic cormorant, and western gull
		Ragged Point Lodge Colony Rocks	35.7789	-121.3320	Nesting site for black oystercatcher pelagic cormorant, pigeon guillemot, and western gull
21 Piedras Blancas/San Luis Obispo North	San Luis Obispo	Point San Simeon Rocks	35.6335	-121.1937	Nesting site for pigeon guillemot
		Island South of Cayucos Point	35.4458	-120.9308	Nesting site for black oystercatcher
22. San Luis Obispo South	San Luis Obispo	Spooners Cove Rocks	35.2747	-120.8909	Nesting site for pigeon guillemot and western gull
		Point Buchon Rocks	35.2551	-120.9014	Nesting site for black oystercatcher, pelagic cormorant, and pigeon guillemot
		Unnamed Rocks	35.2407	-120.8911	Nesting site for black oystercatcher, pelagic cormorant, pigeon guillemot, and western gull
		Pup Rock	35.2208	-120.8727	Nesting site for black oystercatcher and western gull
		Lion Rock	35.2173	-120.8714	Nesting site for black oystercatcher, Brandt's cormorant, pelagic cormorant, and western gull
		Diablo Rock	35.2105	-120.8603	Nesting site for black oystercatcher, Brandt's cormorant, pelagic cormorant, pigeon guillemot, and western gull
		Diablo Canyon Nuclear Power Plant South Rocks	35.2017	-120.8471	Nesting site for black oystercatcher, Brandt's cormorant, cormorant (unidentified), pelagic cormorant, pigeon guillemot, and western gull
		Double Rock Region	35.1905	-120.8208	Nesting site for pelagic cormorant
		Pecho Rock	35.1792	-120.8167	Nesting site for Brandt's cormorant and western gull
		Fossil Point Rocks	35.1735	-120.7245	Nesting site for black oystercatcher, pelagic cormorant, pigeon guillemot, and western gull
		Smith Island	35.1610	-120.7529	Nesting site for black oystercatcher, pigeon guillemot, and western gull
		Shell Beach Rocks	35.1507	-120.6696	Nesting site for black oystercatcher, heermann's gull, pelagic cormorant, pigeon guillemot, and western gull
		North Pismo Beach Rocks	35.1492	-120.6561	Nesting site for black oystercatcher, pelagic cormorant, pigeon guillemot, and western gull
		Point Arguello Rocks	34.5771	-120.6512	Nesting site for black oystercatcher, pelagic cormorant, pigeon guillemot, rhinoceros auklet, and western gull
24. Vandenberg/Point Conception	Santa Barbara	Destroyer Rock	34.6028	-120.6444	Nesting site for black oystercatcher and pigeon guillemot
		East of Destroyer Rock	34.6028	-120.6425	Nesting site for black oystercatcher and pigeon guillemot
		Rocky Point Rocks	34.5643	-120.6403	Nesting site for black oystercatcher and pigeon guillemot
		Point Conception Rocks	34.4479	-120.4712	Nesting site for pelagic cormorant and pigeon guillemot

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[1] See Appendix F for a description of individual sub-units of the CCNM; refer to the Map Atlas for maps of these sub-units

Table D-2. Preliminary List of Known Mammal Sites in the CCNM

Management Sub-Unit[1]	County	Offshore Rock Name/Location	Latitude Decimal	Longitude Decimal
2. Crescent City	Del Norte	Castle Island Shoals	41.7616	-124.2463
3. Redwoods National and State Parks	Del Norte	Redding Rock	41.3433	-124.1750
4. Trinidad	Humboldt	Flatiron Rock	41.0600	-124.1618
		Blank Rock	41.0583	-124.1583
		North of Blank Rock	41.0583	-124.1583
		Mid Rock	41.0567	-124.1591
		Camel Rock	41.0550	-124.1585
6. Lost Coast	Humboldt and Mendocino	Cape Mendocino	40.4500	-124.4100
		Hook Rock	40.3226	-124.3514
		Hair Seal Rock	40.3195	-124.3523
		Sea Lion Rock	40.3133	-124.3500
		Punta Gorda Rocks	40.2433	-124.3383
		Gorda Rock and Punta Gorda	40.2417	-124.3333
		Point No Pass Rocks	39.9717	-123.9917
7. Cape Vizcaino/Westport	Mendocino	Sea Lion Rock and Soldier Frank Point	39.7604	-123.8394
		Soldier Frank Point	39.7547	-123.8383
		North of Rockport	39.7412	-123.8367
8. Fort Bragg/Mendocino	Mendocino	Point Cabrillo Rocks	39.3619	-123.8250
9. Van Damme/Navarro Head	Mendocino	North Cuffey's Point Rocks	39.1443	-123.7397
		Cove Rock	39.1402	-123.7403
12. Saunders Reef/Gualala	Mendocino	Fish Rocks	38.8017	-123.5900
14. Sonoma Coast	Sonoma	Northwest Cape Rocks	38.5650	-123.3333
15. Bodega Head	Sonoma	Bodega Rock	38.2963	-123.0472
22. San Luis Obispo South	San Luis Obispo	Pecho Rock	35.1779	-120.8189

Note: Preliminary list of sites suspected to be used by Steller sea lions. Many sites along the coast are used by California sea lions and harbor seals. Local management agencies should determine which ones of the latter should be protected.

[1] See Appendix F for a description of individual sub-units of the CCNM; refer to the Map Atlas for maps of these sub-units

Appendix E

Preliminary List of Interpretive Themes for the CCNM

AppendixE

Preliminary List of Interpretive Themes for the CCNM

General Information about the CCNM

Theme 1: The CCNM protects the cultural, natural, and geologic resources found on more than 20,000 rocks and islands along the entire coastline of California.

SUB-THEME 1A: The Bureau of Land Management has the primary responsibility to manage this national monument, but works in partnership with its core managing partners, the California Department of Parks and Recreation and California Department of Fish and Game, and other state and federal agencies on a statewide basis, and local governments and communities on a regional basis, to protect and manage these areas.

SUB-THEME 1B: The CCNM was created in 2000 under a Presidential Proclamation. The proclamation in part directs the protection of "the geologic formations that provide unique habitat for biota" that these rocks and islands provide (e.g., for seabirds, sea mammals, and other plant and animal life within this portion of the coastal intertidal zone, as well as the irreplaceable scientific values vital to protecting the fragile ecosystem of the California coastline."

SUB-THEME 1C: The CCNM boundaries begin at the mean high tide line and encompass all of the offshore rocks and islands not within other private or public ownership.

Theme 2: The public is encouraged to use and enjoy the CCNM in ways that do not affect or harm the resources for which the monument was created.

SUB-THEME 2A: The physical isolation from the mainland has protected the unique plants and animals living on the rocks and islands from most human disturbance, making it the last land-based frontier for research on coastal resources.

SUB-THEME 2B: The CCNM is safely viewed from the mainland or on the water by boat. Rough seas and slippery rocks make most of the rocks and islands too dangerous to explore.

Specific Information about Resources Found within the Monument

Theme 3: Nesting and roosting seabirds use the craggy cliffs and flat-topped islands to avoid predators found on the mainland.

SUB-THEME 3A: Because each bird species requires different nesting and roosting conditions, an island's shape, soil or lack of soil, and isolation from disturbance determine the types of nesting birds found there.

SUB-THEME 3B: The entire monument is a major migration corridor that supports birds flying north and south along the Pacific Flyway.

Theme 4: Seals and sea lions use the rocks and small islands to bask in the sun, rest, socialize, and even give birth. The rocks and islands offer safe refuge from the often overcrowded and dangerous mainland beaches.

SUB-THEME 4A: Harbor seals are the most commonly seen, and easily disturbed, marine mammal along the California coast. Groups of the mottled seals spend hours basking on rocks near the water's edge, saving precious body heat between hunts. Females give birth in summer and may leave their pups unattended on the beach while they hunt for food.

SUB-THEME 4B: The northern elephant seal, the largest seal found in California, gathers in large groups on sandy beaches to breed, give birth, nurse, and molt. Once reduced to less than a hundred animals found on Guadalupe Island in Baja California, the seals have made a remarkable recovery and now have major breeding colonies on mainland beaches and larger islands.

SUB-THEME 4C: The California sea lion and Steller's sea lion can generally be found in groups on larger rocks and islands off the California coast from fall through spring. In summer, the California sea lions migrate to Baja California to breed. The threatened Steller's sea lion breeds in California, but in relatively few numbers. Their distinctive barks, larger size, and brown color easily distinguish them from harbor seals.

Theme 5: Crashing waves, gale-force winds, and thin soils limit all but the hardiest plants from growing on these rugged islands. Adaptations to salt spray, a lack of fresh water, and drying winds have created a unique community of plants found nowhere else.

Theme 6: The coastal rocks and islands have been used by people for thousands of years.

SUB-THEME 6A: The seals, birds, and marine life that thrived on the rocks also sustained local families living in villages along the entire coastline.

SUB-THEME 6B: Individual rocks and islands served as spiritual places and still do today for coastal Native Americans.

SUB-THEME 6C: During the late 1700s, European settlers first harvested plants and animals from the rocks and islands; but later, coastal shipping left its marks in the form of piers, anchor rings, lighthouses, buoys, and aids-to-navigation.

SUB-THEME 6D: The material evidence of times past reflects a heritage that is very much alive for the people still living in these coastal communities. Please respect this heritage and leave any items where you find them.

Theme 7: The geology of the California coast is complicated and dynamic.

SUB-THEME 7A: Ancient faults continue to move southern California slowly to the north, creating bays and islands along the fault lines. The erosion-resistant granite found in places like Monterey and Bodega Head can be traced to similar rock found in Baja California.

SUB-THEME 7B: Waves driven by annual storms off the Pacific carve away the soft coastal sandstones and mudstones, creating ephemeral tunnels, arches, and islands that erode to sand grains once again.

SUB-THEME 7C: Rising and falling sea levels over tens of thousands of years have carved a series of benches along the coast. Many of the larger, near-shore islands were once part of the mainland as you can see from their flat tops that mirror the benches carved into the mainland. These areas are comprised of relatively soft rock that is easily eroded by ocean waves.

Information about Recreational Uses and Restrictions

Theme 8: Sea kayaks and small motorized boats provide some of the best views of the monument's rocks and islands.

SUB-THEME 8A: Rough seas and unpredictable waves can turn an adventure into a tragedy. Check sea conditions before entering the water, stay clear of the rocks, and hire a guide if you are unfamiliar with the area.

SUB-THEME 8B: Yield to the wildlife. Sea kayaks and small boats easily frighten seals and sea lions from the rocks. Stay at least 100 yards away from the animals and watch them for signs of disturbance. If they give a "heads-up response," stop and back away.

Theme 9: The rocks and islands support a diverse community of underwater life that in turn supports recreational fishing, scuba diving, and snorkeling. While the boundaries of the CCNM do not extend below the mean high tide line, underwater recreation brings recreationists close to the rocks and islands.

SUB-THEME 9A: Follow the fishing regulations and dispose of line and trash back at the docks to maintain healthy fish and wildlife populations.

SUB-THEME 9B: Rough seas and unpredictable waves can turn an adventure into a tragedy. Check sea conditions before entering the water, stay clear of the rocks, and hire a guide if you are unfamiliar with the area.

Theme 10: The monument's rocks and islands attract a wide variety of wildlife that can be observed from the mainland.

SUB-THEME 10A: Adjoining mainland bluffs offer the perfect location to watch nesting and roosting birds, and resting seals and sea lions without disturbing them. Move slowly, speak softly, and use a spotting scope or binoculars to get a good view.

SUB-THEME 10B: While some rocks and islands can be accessed at low tide, avoid the temptation and use your binoculars from a distance to watch wildlife.

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Appendix F

Management of Lands with Wilderness Characteristics

APPENDIX F

MANAGEMENT OF LANDS WITH WILDERNESS CHARACTERISTICS

MANAGEMENT DIRECTION

Management of lands with wilderness characteristics is part of BLM's multiple-use mandate and is recognized within the spectrum of resource values and uses. Public lands with wilderness characteristics generally:

- Have been affected primarily by the forces of nature, with the imprint of humans substantially unnoticeable;
- Have outstanding opportunities for solitude or a primitive and unconfined type of recreation;
- Have at least five thousand acres of land or of sufficient size as to make practicable its preservation and use in unimpaired condition; and
- Have supplemental wilderness values potentially containing ecological, geological, or other features of scientific, educational, scenic, or historical value.

With exceptions, public lands with wilderness characteristics should be managed to protect one or more of these values. In addition, they should augment the multiple-use management of the CCNM, particularly for the protection of natural features such as the geologic features, wildlife habitat, natural plant communities, and wilderness values.

With exceptions, the following activities generally do not occur within lands with wilderness characteristics:

- Commercial enterprises;
- Roads;
- Use of motor vehicles, motorized equipment, motorboats, and mechanical transport;
- Landing of aircraft; and
- Construction and placement of structures and installations.

However, there are some exceptions to these prohibitions. These exceptions are generally grouped into the following three categories.

- **Valid Existing Rights**. Prior-existing rights may continue. New discretionary uses that create valid existing rights will not be allowed unless they meet the needs under the monument proclamation and would enhance one or more of the wilderness characteristics.
- **Administrative Activities**. New commercial activities or new roads will not be authorized unless consistent with the monument proclamation. BLM may authorize any of the other prohibitions if necessary to protect one or more of the wilderness characteristics or the health and safety of persons within the area.
- **Other General Allowances.** Subject to limitations determined by the State Director, general allowances could include actions necessary to control fire, insects, and diseases; recurring federal mineral surveys; establishing livestock grazing; commercial services to the extent necessary for activities that are proper for realizing the recreational or other wilderness character purposes and compatible with the defined values; and adequate access to inholdings.

SPECIFIC GUIDANCE

1. **Emergencies.** The use of motor vehicles and mechanical transport and the construction of temporary roads, structures, and installations will be allowed (1) for emergency purposes and when consistent with the management principles of the monument; and (2) if necessary to protect one or more of the wilderness characteristics, or the health and safety of persons within the area.

2. **Land Disposals, Rights-of-Ways, and Use Authorizations.** These lands will be retained in public ownership. As directed by the Presidential Proclamation that established the CCNM, lands within the CCNM can be disposed of only by exchange that furthers the protective purposes of the monument. Prior existing rights, such as leases under the Recreation and Public Purposes Act, leases/permits under 43 CFR 2920, and rights-of-ways (ROWs) may continue. These rights also could be renewed if they are still being used for their authorized purpose. New authorizations, leases, permit, and ROWs will not be authorized because they are considered new valid rights, with the possible exception within the CCNM for aids-to-navigation needed for health and human safety.

3. **Routes of Travel.** The construction of new permanent roads will not be allowed. New temporary roads could be allowed if BLM determines they are necessary to protect one or more of the wilderness characteristics, or the health and safety of persons within the area; or if necessary to control fire, insects, and diseases.

4. **Fire Management.** Fire management will be consistent with BLM policy. New fire management structures will be allowed if they are necessary to protect one or more of the wilderness characteristics, or the health and safety of persons within the area.

5. **Vegetation Health.** Insects, disease, and invasive species may be controlled if determined necessary to protect one or more of the wilderness characteristics, or the health and safety of persons within the area. Insect and disease outbreaks should not be artificially controlled, except to protect other valuable resources. Vegetative manipulation to control noxious, exotic, or invasive species will be allowed when there is no effective alternative and when the control is necessary to maintain the natural ecological balances within the area. Control may include manual, chemical, and biological treatment provided it will not adversely affect the wilderness characteristics.

6. **Recreation.** Primitive and unconfined recreational uses such as hiking, camping, rock climbing, caving, fishing, hunting, and trapping will be allowed to continue on lands with wilderness characteristics so long as they are consistent with the management objectives within this plan.

   Recreational uses should not be allowed if they require:

   - Motor vehicles or mechanical transport (e.g., mountain bikes) off routes designated as open or limited, as designated through the route designation process.
   - The use of motorboats.
   - Permanent structures or installations (other than tents, tarpaulins, temporary corrals, and similar devices for overnight camping).

   New commercial services will not be allowed unless they are necessary for realizing the primitive and unconfined recreational values. An example of an allowed commercial service would be an outfitting and guide service. Existing commercial recreational authorizations may be allowed to continue under existing terms and conditions to their expiration date. Recreational or hobby collecting of mineral specimens when conducted without location of a mining claim may be allowed. This use will be limited to hand collection and detection equipment.

7. **Cultural and Paleontological Resources.** Cultural and paleontological resources are recognized as unique and valuable. They also provide important supplemental values to an area's wilderness character. Resource inventories, studies, and research involving surface examination may be permitted if they benefit wilderness values and the values with the CCNM proclamation. This same standard applies for the salvage of archaeological and paleontological sites; rehabilitation, stabilization, reconstruction, and restoration work on historic structures; and excavations. Extensive surface collection also may be permitted for a specific project. Permanent physical protection, such as fences, will be limited to those measures needed to protect resources eligible for listing in the National Register of Historic Places and will be constructed so as to minimize impacts on apparent naturalness.

8. **Wildlife Management.** Fish and wildlife resources are a special feature that may contribute to an area's wilderness character. Whenever possible, these resources should be managed to maintain that character. Nothing in this plan will be construed as affecting the jurisdiction or responsibilities of the State agencies with respect to fish and wildlife management on these lands. Fishing, hunting, and trapping are legitimate activities on these lands. The State establishes regulations and enforcement for these uses. State wildlife agencies and BLM are responsible for fostering a mutual understanding and cooperation in the management of fish and wildlife. Management activities on these lands will emphasize the protection of natural processes. Management activities will be guided by the principle that a project can be accomplished if it is necessary to protect one or more of the wilderness characteristics, or the health and safety of persons within the area. Management of public lands with wilderness character should follow the guidelines provided in the Memorandum of Understanding between BLM and the International Association of Fish and Wildlife Agencies. Management also will follow any additional site-specific wildlife decisions addressed through the land use planning process.

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DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
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